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Norwich to Tilbury

Volume 8: Examination Documents

Document: 8.4.18 Applicant's Comments on any Further Information or Submissions Received by Deadline 7

Final Issue A

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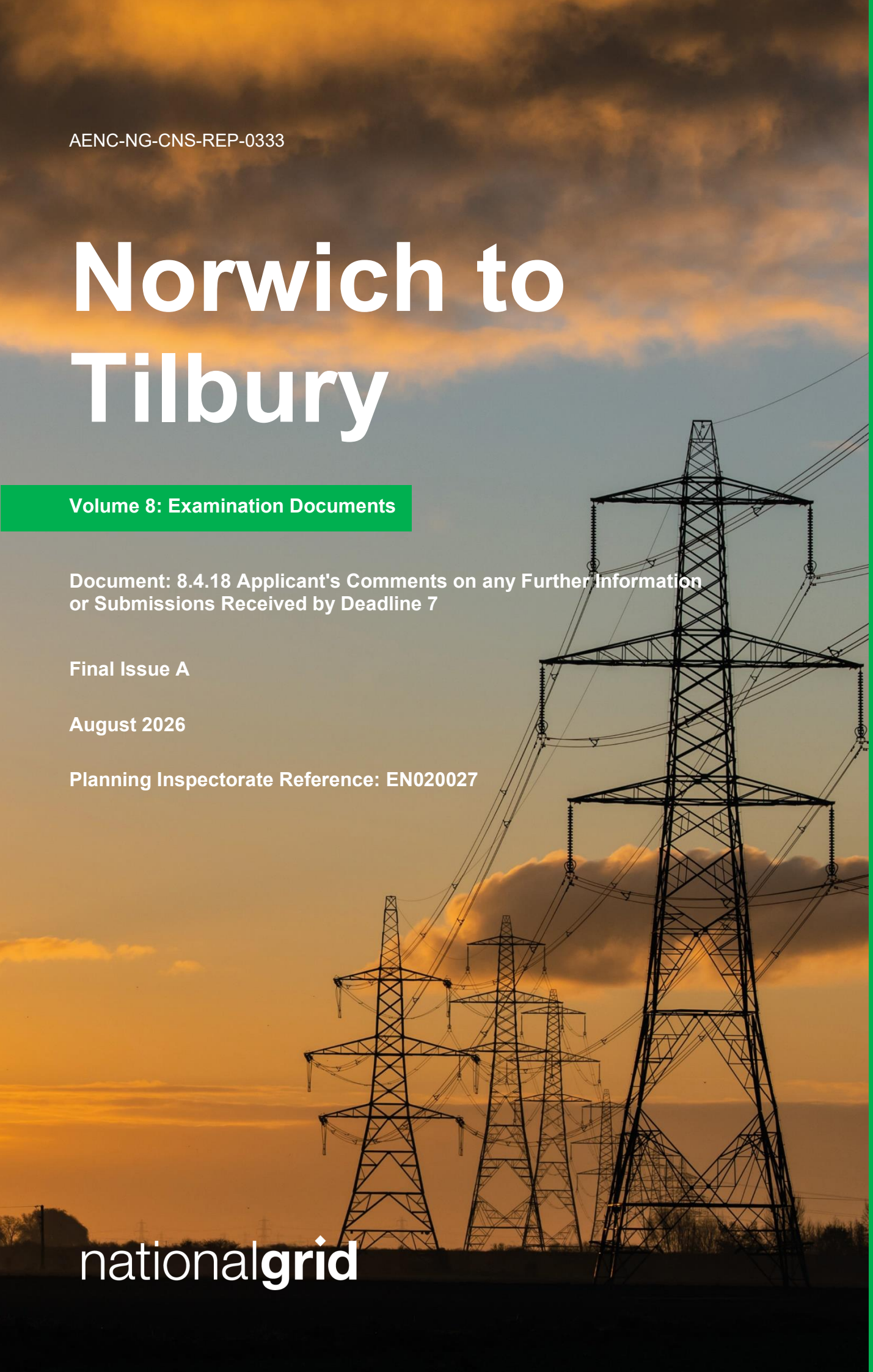

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1 Introduction

1.1 Purpose of this Document

1.1.1 A number of submissions by Interested Parties (IPs) and Affected Parties (APs) were accepted into the examination at Deadline 7. The Applicant has reviewed these submissions. This document provides a response where content is directed to the Applicant and the Applicant considers it would be useful for the purposes of the examination to address a new point, provide a correction, or signpost to information provided elsewhere in the Applicant's documents that provides a response. In some cases, this is a cross reference to a response previously provided by the Applicant where this addresses the point made.

1.1.2 A number of submissions were also made by IPs in response to the Rule 17 Letter issued on 14 July 2026 [PD-031]. The Applicant provides its comments on those responses separately, in 8.4.19 Applicant's Comments on Responses to 14 July Rule 17 Letter.

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

1.1.4 This document includes a response to the intended Deadline 7 submission by Tendring District Council. This was shared directly with the Applicant at Deadline 7, however it is understood that the submission was not correctly submitted to the Planning Inspectorate at Deadline 7 and therefore has not formed part of the Examination documentation or Examination library. It is understood that it is to be accepted at Deadline 8. The Applicant has however included its response to the submission in this document, in recognition that it is the last Deadline and that it may be of assistance to the ExA and the Council to have the Applicant's response.

1.1.5 The Applicant has in some instances summarised Interested Party submissions, in whole or in part, where doing so provides a proportionate approach. Where a document is summarised, the Applicant has sought to clearly identify this. Similarly, the Applicant has not always replicated the formatting, images or footnotes provided in the original submission, in order to aid legibility of this document.

1.1.6 The following Appendices are included in the document:

- Appendix A: Applicant's Comments on Responses to the Report on the Information for European Sites
- Appendix B: Applicant's Comments on Suffolk County Council submission 'Comments on Submissions received at Deadline 6' [REP7-573]
- Appendix C: Applicant's Comments on Deadline 7 submission by Ardleigh Parish Council and Little Bromley Parish Council [REP7-540]

- Appendix D: Conductor data relating to response to REP7-568 Pylons East Anglia

2 Applicant's Comments on Deadline 7 Submissions

2.1 Overview

2.1.1 The table below provides the Applicant's comments on Deadline 7 submissions. These are provided in alphabetical order.

Table 2.1 Applicant's Comments on Deadline 7 Submissions

Examination Library ID	Name	Matter	Applicant Comment
REP7-536	Adrian Ramsay MP	The Norwich to Tilbury project runs through my Waveney Valley constituency, affecting the wards of Bunwell, Bressingham and Burston, Diss and Roydon, Palgrave, Gislingham, Rickinghall, Bacton, Mendlesham, and Haughley, Stowupland and Wetherden. Responses have been supplied by councils and individuals along this route and it is important that they are all considered carefully. Families who live in these places, some for generations, understand the areas best. I have concerns about the consultation that has been carried out by National Grid prior to the application for this Development Consent Order. Communities and individuals have contacted me to say that they fed into the process but felt ignored, with one describing the consultation as "a joke". You will see this opinion reflected in the responses you have received, including those from Cotton Parish Council. Many residents of Waveney Valley have contacted me to say that they have not felt heard in consultation to date, so I very much hope that this planning inquiry will fully consider the evidence and assess the impacts and options for how best to deliver the improved energy connectivity and decarbonisation we need while minimising impacts on communities and the natural environment.	The legal framework that applies to this application is that set by the Planning Act 2008, which was specifically designed by Parliament for Nationally Significant Infrastructure Projects of this character. Under section 55(3)(e) of that Act, the Planning Inspectorate may only accept a DCO application if the applicant has complied with the pre-application consultation requirements in Chapter 2 of Part 5, including the section 47 duty to consult the local community. This application was accepted into examination by the Planning Inspectorate, and that acceptance necessarily involved the Inspectorate forming a view on the adequacy of the consultation undertaken. The Applicant relies on the fact that the Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. The Applicant is also conscious that the Gunning Principles, as endorsed by the Supreme Court in R (Moseley) v London Borough of Haringey, require that consultation occurs when proposals are at a formative stage, that sufficient information is provided to permit an intelligent response, that adequate time is given, and that the product of consultation is conscientiously taken into account. The Applicant's independent legal advice is clear that the suggestion the pre-application consultation is legally flawed is incorrect, and that when the statutory scheme, associated ministerial guidance and the Gunning Principles are applied in their proper context, the consultation meets or exceeds what is required. The Applicant understands that not everyone agrees with that assessment, and has read the opinions put forward on behalf of individuals, parish councils, and other groups carefully and with respect. On the question of whether the Applicant has genuinely listened and responded to feedback: the Applicant allowed 8 weeks for each of the 2022 and 2023 non-statutory consultations, 15 weeks for the 2024 statutory consultation, and then carried out targeted consultations from January to April 2025 where significant changes arose following statutory consultation. Community and landowner engagement has been continuous, structured and iterative, encompassing two rounds of non-statutory consultation, statutory consultation from April to July 2024, and ongoing negotiations through submission and examination, with landowners contacted directly, provided with plans and materials, invited to events and offered meetings. That engagement produced concrete results. The Applicant took account of feedback through a formal change control process and made changes including alignment and pylon siting adjustments, refinements to order limits and land-take/interference, and access and mitigation measures, with targeted engagement carried out wherever proposed changes could materially affect individual interests. The Applicant acknowledges that not every suggestion received could be incorporated. Sometimes a requested change would have created difficulties elsewhere along the route or conflicted with technical, environmental or policy requirements.

Examination Library ID	Name	Matter	Applicant Comment
REP7-536	Adrian Ramsay MP	There is little or no evidence that alternatives to the proposed Norwich to Tilbury pylon route have been considered. Aside from offshore and underground routes, possibilities which have been raised include a new line of pylons closer to the existing route, closer to the A140 and upgrading the wires to composite core conductors as in Germany. I have seen no proper consideration of these options. I remain concerned about the effect that pylons would have on the Waveney Valley to the west of Diss, past Wortham Ling and Roydon Fen. Pylons would be out of character with this landscape which would be irreparably harmed by their installation.	The Applicant is confident that it has adequately considered alternatives and has provided details on the alternatives considered in **7.17 Strategic Options Backcheck and Review [APP-355]** and the various Design Development Reports **[APP-358, APP-359 and APP-122]**, including those to the east of Diss (closer to the A140) in 5.15 Design Development Report **[APP-122]** from Paragraph 4.6.21. The Applicant would refer to previously provided responses regarding the use of composite core conductors in response to comments made in Appendix D1 of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]** (page D1-5).
REP7-536	Adrian Ramsay MP	In addition to the effect on the landscape, I continue to be concerned about the effect on the inhabitants of Roydon if the village were surrounded by pylons on three sides. This route is unnecessary and should be altered to a straighter line which would have less impact. I request that the Planning Inspectors visit three specific sites in the northern part of my constituency: I request that the Inspectors visit Roydon and Wortham Ling to see how pylons would impact the landscape. I request also that the Inspectors visit the ancient woodland near Bunwell, owned by [name redacted in source], to appreciate its irreplaceable nature. I repeat my request for an accompanied site visit to Tibenham Airfield to fully understand the safety issues and potential danger to life that would be created by pylons sited as planned.	The Applicant has responded to previous concerns relating to landscape and visual effects, including in relation to Roydon and Wortham Ling in Table 2.47 of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [REP7-474]**. The Applicant previously responded to concerns raised in REP1-417, REP1-327 and REP1-416 relating to the perception of the village of Roydon being 'surrounded by pylons on three sides' as set out in **8.8.1 Applicant's Comments on Written Representations [REP2-029]**. The Applicant notes the appearance of the route on a plan is not the same as the on-ground experience. At this location a combination of landform and screening by buildings and vegetation mean that very few locations will have visibility of pylons to three sides. Wortham Ling Site of Special Scientific Importance (SSSI) has been carefully avoided by the Project so there would be no direct impacts. The Applicant notes the request for the Inspector to visit the ancient woodland near Bunwell Hill. The Applicant assumes this is a suggestion to visit Meadow Wood Nature Reserve County Wildlife Site, which has been discussed with stakeholders and mitigation agreed within **7.4 Outline Landscape and Ecological Management Plan [REP7-342]**. No ground-breaking works would take place within this designated site. A route has been selected to minimise impacts to the veteran trees. Efforts will continue to be made at detail design to further minimise the tree works associated with the electrical clearance that would affect this designated site.
REP7-536	Adrian Ramsay MP	The comments I made at the Open Hearing are below [Applicant note: these are not replicated in this document as they were heard and responded to earlier in Examination]	The Applicant has responded to the points made by Adrian Ramsay MP at Open Floor Hearing 3 in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]**.
REP7-538	Alexandra Macadam	Historic England disagree with National Grid over the level of harm to the setting of Little Wenham. In their reply REP 4-383 the response from the applicant seems incorrect when the applicant states that historic England must agree with them because they have not commented ; but the opposite is true. Historic England have consistently said. That the level of harm is higher than national grids estimation . Historic England have also disagreed with national grid on the harm to the grade 2 star tithe barn which National Grid have tried to say it is outside the order limits but is clearly not. We have suggested that the CSE Raydon j35 should be moved north of the railway line . : and we are aware that there has been no consultation with raydon wings who are concerned on grounds of aircraft safety and have advocated the same solution. I refer to historic England written representation page 19 , 259/260	With regard to Wenham Castle (1003759/1033405), Historic England **[REP1-191]** has stated "***but we would agree with the applicant's assessmen***t, although the harm might be closer to a mid-level [Less Than Substantial Harm]" (Applicant's emphasis [and clarification]). The Applicant acknowledges that Historic England is of the opinion that the setting of the Grade II* listed barn (1194552) extends to the Order Limits resulting in low Less Then Substantial Harm. These are matters of professional judgement/opinion, and this is recognised by both parties. This is reflected in the Statement of Common Ground signed by both parties (**5.9.14 Signed Statement of Common Ground - Historic England [REP7-120]**). The Statement of Common Ground records that despite the differences of professional opinion on the level of Less Than Substantial Harm on these assets, the Project would not result in any substantial harm to any designated heritage assets including those noted by the respondent. The Applicant notes the comment regarding the request to move the CSE compound at Raydon further north and has previously responded to the respondent's request in **8.8.1**

Examination Library ID	Name	Matter	Applicant Comment
			Applicant's Comments on Written Representations [REP2-029] (in responses to REP1-292). The Applicant has consulted with Raydon Wings, details of engagement can be seen in **8.3.35 Final Statement of Common Ground - Raydon Wings Aerodrome [REP7-433]**. The Applicant's post hearing update to Raydon Wings at 7.2d within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** stated that the Applicant is not currently pursuing changes to the location of the Cable Sealing End (CSE) compound or the overhead line in the vicinity of the aerodrome. Furthermore, due to the absence of requested evidence to justify re consideration of alternative locations and the Applicant's confidence in its original impact assessment, the Applicant now confirms it will not be pursuing any further design changes.
REP7-538	Alexandra Macadam	The public benefits arising from the proposed pylon line in south Babergh is very much required yet it is not acceptable to contravene 1979 Archaeology Areas Act and the NPPF Guidance for Scheduled Monuments and their settings for future generations . The pylons should be undergrounded from J35 to J20 and the CSE should be moved further north to the other side of the railway line in order to be more hidden from Wenham and for aircraft safety. T pylons would be much less intrusive. other main issues to discuss are effect on users of public rights of way crossing the fields effect on living conditions of local residents regarding noise glint glare and visual impact effect on Best & Most Versatile Land (BMV) Drainage is never the same to fields effect on surrounding landscape and its status having regard to ; the proximity of the natural landscape and additional pylon view at only 1km away. Does the proposed pylon line preserve the setting of the Little Wenham listed buildings ? I have no doubt Little Wenham Hall was a building of significant status to the surrounding area , its land , and buildings. It is representative of a high status manorial complex of traditional local construction. The pylons would be an adverse change to the setting of the highly graded Little Wenham Church and medieval Tithe barn through harm to its agrarian setting. This harm is significant given the inter relationship with the other historic buildings in the complex. REP 1 191 not recognized by the applicant . Historic England 8.8.1 page 75 comments the applicant says pylons may only " potentially" be seen from grade 2* listed tithe barn ; this disagrees with Historic Englands statement that it would incur mid level harm The proximity of buildings increases weight to that harm Planning Act 1990 (the LB&CA Act) which have special regard to desirability of preserving building setting, . JLP Policy LP19 seeks to enhance historic environment . Little Wenham ,which is open to the public, is recorded in the Doomsday Book and illustrated in historic maps Hodskinson 1783 . The ring of manorial woodland and lattice work of paths and fields and lanes ....some fields have been amalgamated but are still within a medieval framework of hedgerows and lanes, Many of these buildings can easily be identified on the 1838 Tithe map recorded in Suffolk HER. Given the former manorial role the relationship to the open farmland is important . In terms of landscape character the site falls within the ancient estate farmlands (Suffolk County Landscape Character Assessment and joint Babergh and mid Suffolk District Council landscape Guidance2015). The proposed pylon development would have a marked impact on the landscape.	The Applicant maintains the position previously set out in response to similar landscape and visual matters raised in the following related comments: • REP1-292 in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** • REP4-383 in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]** • REP6-176 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** The Applicant refers the respondent to its comments above. With regard to the quoted legislation, the Ancient Monuments and Archaeological Areas Act 1979 is only concerned with the physical attributes of Scheduled monuments and is not concerned by impacts to setting. The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024) states: '*215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*.' The assessment has been undertaken in accordance with this and the Applicant considers that the public benefit derived from the Project outweighs the lower Less Than Substantial Harm that would be experienced by the scheduled monument/listed building Wenham Castle (Little Wenham Hall)/Little Wenham Castle. The Applicant also asserts that the public benefit of the Project outweighs the controls regarding the historic environment included in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Babergh and Mid Suffolk Joint Local Plan (adopted 2023). With regard to Public Rights of Way, the Applicant reiterates that the overall strategy, as set out in all versions of **7.6 Outline Public Rights of Way Management Plan [REP7-354**], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through appropriate temporary diversions. As a result, no PRoW within Suffolk would be subject to closure without a diversion in place, and no severance of the overall network is anticipated from the Norwich to Tilbury project. With regards to the effects on Best and Most Versatile (BMV) agricultural land, the Applicant maintains the position previously set out in response to similar matters raised in REP6-208 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 7 [REP7-481].** The Applicant has also made several commitments to maintaining provision for land drainage, including agricultural drainage and irrigation systems. These are detailed in commitments AS05 and W04 within **7.2 Outline Code of**

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		LP policy LP15 seeks that the avoidance of BMV land is prioritized , which it is sadly not, south of the Raydon CSE. The corona discharge glow of the CSE emitting violet glow at night , is yet another harm to the night sky. Raydon wings aerodrome should not be allowed aviation red and white hazard warnings which would be incredibly harmful for the view of scheduled ancient monuments. The harms identified to this nationally important group of highly graded designated assets would cause an immediate harmful effect that cannot be satisfactorily mitigated in the long term. Thus the proposed development would not accord with the provisions of the development plan when read as a whole and in particular policies SO3,SO9,LP19,LP25., nor would there be accord with the Framework. In addition to the heritage harms , which have to be fairly weighed with the public benefits , there is harm to the landscape character of the area , with further harm to the setting of the national landscape. I conclude that this proposed pylon line should be undergrounded from J20 to J35 . and that the Raydon CSE should be moved north of the railway line for safety and more screening .	**Construction Practice [Revision H]**, as well as to safeguarding runoff patterns and the water quality of watercourses and water bodies.
REP7-538	Alexandra Macadam	In answer to concerns I raised in ISH2 and helped by the Inspectors letter of June 5, which was replied to on June 18, National Grid have responded by referring to 8.4.12, REP5-194 and 8.8.1,REP2-029. In both cases they refer to their assessment process as being robust and they appear to set their benchmark at avoiding severe harm because they argue that less than severe harm is acceptable. It is hard to accept that the process is robust when they assume (REP4-383) that Historic England agree with their assessment when Historic England clearly have a different opinion (Written Representation 2.59/60). Historic England agree that there is not substantial harm but they believe that there is mid level harm. Nowhere in their assessment have National Grid attempted to justify their view that the bar should be substantial harm when the 1979 Archaeological Areas Act and the NPPF guidelines demand that Scheduled Monuments and their Settings have an exceptionally high level of care. For National Grid to think that their view should prevail over Historic England is quite extraordinary when one is a specialist in power distribution and the other is an expert on historic monuments. National Grid have also disagreed with Historic England on the degree of harm to the Grade 2 Star tithe barn which is part of the setting and which would be the nearest building to the pylon line (See REP1-191). National Grid have attempted to dismiss the tithe barn by saying that it is not part of the setting which is definitely not true. The barn was (and is) an integral part of the farmyard which is the setting for the Castle. When Historic England say that the pylon line can be seen from the barn, National Grid say, grudgingly, that " potentially " that might be true. Yet again National Grid are trying to denigrate Historic England's opinion. We have suggested that the CSE at J35 should be moved northwards beyond the old railway line and are aware that Raydon Wings airstrip has suggested the same on the grounds of aircraft safety. This would seem to be a sensible suggestion but we are aware that National Grid has not been willing to consult on it with Raydon Wings or ourselves. We recognise that National Grid want to stay close to their planned line but it is surely in the national interest to preserve as much as possible of the heritage of the	With regard to the IP's first and second paragraphs, the benchmark for 'Substantial Harm' is set out in Overarching NPS (EN-1) (Department for Energy Security and Net Zero (DESNZ), 2024) and the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024). The Applicant has provided an overview of the relevant sections of these documents and a methodology for their application in the assessment of harm in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [REP7-254]**. The Applicant asserts that it has applied statutory guidance correctly and is confident in the findings of the assessment. The Applicant adds that, whilst there remains slight differences in professional opinion, Historic England and the Applicant have signed a Statement of Common Ground (**5.9.14 Signed Statement of Common Ground - Historic England [REP7-120**]), and it is agreed that the Project would not result in Substantial Harm to any designated heritage assets. With regard to the IP's third paragraph, the Applicant is advised by Heritage Professionals with several decades of combined experience and no attempt to denigrate the opinion of the fellow professionals representing Historic England has been made. As noted above, Historic England and the Applicant have reached a consensus, and this is recorded in document **5.9.14 Signed Statement of Common Ground - Historic England [REP7-120]**. The Applicant notes the comment regarding the request to move the CSE compound at Raydon further north and has previously responded to this request in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (see response to REP1-292). The Applicant has consulted with Raydon Wings, details of engagement can be seen in **8.3.35 Final Statement of Common Ground - Raydon Wings Aerodrome [REP7-433]**. The Applicant's post hearing update to Raydon Wings item number 7.2d within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** stated that the Applicant is not currently pursuing changes to the location of the Cable Sealing End (CSE) compound or the overhead line in the vicinity of the aerodrome. Furthermore, due to the absence of requested evidence to justify re consideration of alternative locations and the Applicant's confidence in its original

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		country rather than disregard the letter and spirit of the 1979 Archaeology Areas Act and the NPPF guidance for Scheduled Monuments and their Settings.	impact assessment, the Applicant now confirms it will not be pursuing any further design changes.
REP7-543	Basildon BESS Ltd	I write on behalf of Basildon BESS Limited in respect of the Norwich to Tilbury DCO to confirm that Basildon BESS wishes to withdraw its representation (reference RR-0334) to the proposed DCO.	The Applicant welcomes Basildon BESS Ltd's withdrawal of their representation.
REP7-542	Babergh and Mid Suffolk District Councils	*7.2 Outline Code of Construction Practice (Tracked) (Final Issue F) [REP6-073]* BMSDC refer to their submissions at ISH4 and deadline 6 [REP6-135] and reiterate the request for a comprehensive strategy for ongoing compliance monitoring and reporting, plus enforcement and regularisation procedures for all reported complaints and identified non-compliance. This strategy should be in the form of an appendix to the CoCP as it is necessary to ensure compliance for all matters in the delivery of the development. The strategy will provide the basis for a collaborative, proactive and responsive approach to compliance, minimising delays to delivery arising from non-compliance, investigation of complaints and regularisation. The strategy will provide greater stakeholder confidence in the accountability of the Applicant as developer, and clarity for the respective local authorities, and other parties, as enforcing authorities. The strategy will also inform affected communities and businesses as to the expected actions and processes in place to ensure ongoing confidence in the compliant delivery of the development and the swift regularisation of incidents of non-compliance that are considered inevitable for a project of this scale and complexity.	The Applicant refers to its submissions at ID 9.8 and 9.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and reiterates that the responsibility for construction management, compliance and day-to-day control rests with the Applicant and its contractors. This is established through 7**.2 Outline Code of Construction Practice [Revision H]**, secured by Requirement 4 of **3.1 Draft DCO [Revision H]**. The Outline Code of Construction Practice provides the overarching framework for construction management and is supported by the suite of management plans, monitoring and reporting mechanisms secured through the DCO Requirements. The Applicant considers that the current framework provided within the application documents and the draft DCO provide sufficient provision for both the Applicant and host authorities to carry out their duties to ensures lawful delivery of the Project. The Applicant notes that the Planning Act 2008 already provides a robust enforcement framework in relation to compliance with a Development Consent Order. Section 161 makes it an offence, without reasonable excuse, to carry out development in breach of the terms of a Development Consent Order or otherwise fail to comply with its requirements. In addition, where a local planning authority has reasonable grounds to suspect such a breach, it has powers to investigate under section 163 and may apply to the Court for an injunction under section 171 to restrain any activity that constitutes an offence under sections 160 or 161. Accordingly, the undertaker has a continuing legal obligation to ensure that the authorised development is implemented in accordance with the DCO and the consented scheme, and local planning authorities already have significant enforcement powers where they consider that a breach has occurred. This enables local authorities, in their role as enforcing authorities under the Planning Act 2008, to review compliance, investigate potential issues, respond to complaints and undertake enforcement action where necessary, while maintaining the Applicant's responsibility for monitoring, record-keeping and day-to-day compliance management. The Applicant therefore considers that **7.2 Outline Code of Construction Practice [Revision H]** provides an appropriate and proportionate framework that minimises the risk of non-compliance through applicant-led controls, with enforcement retained as an appropriate regulatory backstop. The Applicant does not consider that regular compliance monitoring reporting would be necessary. The Applicant's compliance monitoring is undertaken through a combination of daily, weekly and monthly inspections, audits, checks and internal reporting processes carried out by the Applicant and its delivery partners. The volume of information generated is substantial and much of it relates to routine assurance activities rather than matters requiring regulatory intervention. The routine provision of all such information would create a significant administrative burden for both the Applicant and host authorities, requiring considerable resource to collate, review and interpret, whilst providing limited additional regulatory benefit. The Applicant is committed to maintaining a transparent and collaborative relationship with host authorities throughout the construction period. Regular project governance meetings

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			and subject-specific engagement forums provide ongoing opportunities to discuss compliance matters, emerging issues and lessons learned. The Applicant is not aware of any DCO or Town and Country Planning Act 1990 consent with the requested provisions a requirement or condition of the consent.
REP7-542	Babergh and Mid Suffolk District Councils	*8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 (Final Issue A) [REP6-118]* Response to item number 5.4f, page 60 BMSDC notes there remains no mention / assessment of cumulative effects of the project with other reasonably foreseeable developments in the area of Bramford substation, specifically the Alcemi BESS development at Bramford / Bustall. BMSDC note that the examination timetable required the submission of an updated version of the interrelationship report at deadline 7 and will provide any comments on this document at deadline 8	The Applicant has carried out a cumulative effects assessment of the Project with other developments, including those in the area of Bramford Substation. This forms part of the Environmental Statement, and was first submitted with the application for development consent **[APP-281 to APP-286]**. The assessment was later updated at Deadline 4 and at Deadline 7 of the examination to ultimately take into account planning applications submitted up to 8 May 2026. The update submitted at Deadline 7 (**6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]**) includes an assessment of the Alcemi BESS development, for which requests for an EIA Scoping Opinion were made to the council on 5 May 2026. The developments close to Bramford Substation that have been included in the Project's cumulative effects assessment are shown on Page 10 of Figure 17.2 (Cumulative Effects Short List of 'Other Developments' Considered within the Cumulative Impacts Assessment) of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]**. The development is screened in the Stage 1 and Stage 2 assessment in Appendix A and assessed in Appendix B of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]**, submitted at Deadline 7 of the examination. The nearest developments to Bramford Substation shown on this plan and that therefore have been included in the Project cumulative effects assessment are: • Bramford To Twinstead (Applicant's assessment reference DCO2) • East Anglia THREE Offshore Wind Farm (assessment reference BMS45) • Bramford Solar Farm and Battery Storage (assessment references BMS31, BMS42, BMS52 & BMS68) • Battery Energy Storage System (BESS) adjacent to Bullen Lane (assessment reference BMS70) • BESS to the south of Bullen Lane (assessment reference BMS92) • Brunfort BESS promoted by Alcemi Storage Developments 1 Limited (assessment reference BMS114) An updated **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP7-477]** was submitted at Deadline 7 of the examination, as requested by the ExA.
REP7-542	Babergh and Mid Suffolk District Councils	*8.13 Outline Employment and Skills Plan [REP5-215]* BMSDC were unable to comment on the OESP at deadline 5 and take this opportunity to make comments as the document currently stands. BMSDC reserve the right to make any further necessary comments on this document at deadline 8. Babergh and Mid Suffolk District Councils endorse and support the detailed comments submitted by SCC in relation to the OESP and have the following specific comments to make. The OESP appears well aligned with national infrastructure policy and demonstrates a commitment to generating local economic benefits. Its strengths lie in recognising existing regional skills assets and proposing collaborative working with education providers and employers. The principal implementation risks are:	**8.13 Outline Employment and Skills Plan [REP7-489]** (OESP) is an outline document. As such, it sets the scope for the preparation of the final document, acknowledging that this will include for further detail on matters such as workforce profile, type and duration of jobs, skills and supply chain requirements and the strategic co-ordination of procurement activities. The OESP also commits the Applicant and its Main Works Contractors to work with key stakeholders which will include those local authorities with specific remits for education, skills and employment including associated partners such as BMSDC. In terms of governance and management, paragraph 7.3.3 of the OESP states that the Final ESP will set out the process for engagement with a proportionate group of stakeholder representatives, including membership thereof, frequency of meetings, monitoring, reporting and review as well as general terms of engagement. The OESP states that the scope of monitoring, reporting and review will be proportionate to the measures and outcomes

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		• Shortages of skilled construction and engineering labour. • Competition from other major infrastructure projects. • Difficulty converting local residents into job-ready workers quickly enough. • Supply-chain capacity limitations among local businesses. • The need for strong governance and measurable targets in the final Employment and Skills Plan. From a local economic development perspective, the success of the plan will largely depend on how early National Grid and its contractors engage with partners including colleges, training providers and employers to build workforce capacity before construction reaches peak activity. Whilst appreciating that this is a 'strategic plan', many of our current concerns highlight the need for more detail. There is no reference to governance, risk or ongoing management of the ambitions contained within the OESP, it is essential that a clear, robust framework is set out and adhered to, to ensure that the programme meets local identified need and that it delivers significant social value benefits for our residents.	identified in the Final ESP and focused on demonstrating their implementation and effectiveness.
REP7-542	Babergh and Mid Suffolk District Councils	*8.13 Outline Employment and Skills Plan [REP5-215]* Possible workforce shortages - skills available to serve needs of NSIP's: The Skills Plan states that all parts of the Study Area have a substantial supply of people with vocational and technical qualifications that are relevant to construction, utilities and infrastructure-related employment. The Plan acknowledges that employers continue to report persistent skills shortages, particularly in skilled construction trades, electrical and engineering occupations, and mobile-plant and specialist technical roles. Forecasts highlight strong future demand for these skills, which may be compounded by cumulative pressures arising from multiple NSIPs being advanced across Norfolk, Suffolk and Essex (including Thurrock) with over overlapping time periods. The Plan highlights existing strong local skills assets including further and higher education institutions, specialist construction and utilities training providers, Skills Bootcamps and employer-led skills initiatives that may address these potential gaps. Section 4.5.3 identifies a strength across the Norwich to Tilbury route in construction but does not identify whether this strength – and therefore demand for labour – can easily be met from the local population. This needs to be assessed as there are already identified shortages of skills arising from existing NSIP's such as Sizewell C and offshore wind. It is likely that Norwich to Tilbury will exacerbate these shortages without careful modelling and actions to specifically address these issues on an area-by-area basis.	The Study Area benefits from a strong construction sector as explained within **8.13 Outline Employment and Skills Plan [REP7-489]** at Section 4.5. This section of the Plan also refers to established energy-focused supply chains supported by well-recognised organisations which are already supporting skills development, supply chain co-ordination and inward investment. The Applicant and its Main Works Contractors will therefore work with local organisations such as those referred to in the OESP to maximise opportunities for local economic benefits. It should also be noted that **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [REP7-296]** identifies that approximately 10% of the Project workforce will be sourced locally (this relates to approximately 480 staff over the construction period of the project). This local workforce demand reflects the scale and nature of the Project which is linear, resulting in a more dispersed workforce than would be expected with a single site project, and requires specialist contractors. Whilst Norwich to Tilbury represents a significant infrastructure investment therefore, its peak construction workforce is also substantially lower than that associated with major projects such as Sizewell C. The Applicant is confident in the capacity of the civils supply chain.
REP7-542	Babergh and Mid Suffolk District Councils	*8.13 Outline Employment and Skills Plan [REP5-215]* Need for industry collaboration to be reflected in skills plans – to enable trained staff to move between NSIP's and mitigate potential skills gaps: There is a recently signed MoU between the Energy & Utility Skills Group and the Electricity Transmission Industry Collaboration who have published new workforce research that strengthens their joint commitment to secure the skilled people required to deliver the UK's electricity transmission investment plans including Norwich to Tilbury. However recent research published by the Energy & Utility Skills Group and the Electricity Transmission Industry Collaboration has highlighted that 35,000 vacancies must be filled during the current regulatory period (T3 – 2026-31) across the UK. Critical	The Applicant notes the Councils' comments. It has established the Great Grid Partnership (GGP) to support the delivery of the Project and other Accelerated Strategic Transmission Investment (ASTI) schemes. Through the GGP workforce requirements continue to be reviewed and refined, enabling early workforce planning, resource management and the proactive management of known shortages in specialist transmission roles across the wider portfolio. The Applicant is therefore confident that cumulative workforce and supply chain pressures have been appropriately considered.

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		at-risk roles include high-voltage (HV) design engineers, project managers, electrical fitters, and overhead lines people. It would be good to see more detailed plans for how this will be dealt with on the N to T NSIP – some specific planned actions as opposed to general statements about existing skills assets and hope. There are already skills gaps emerging through SZC around welding and steel fixing for instance.	
REP7-542	Babergh and Mid Suffolk District Councils	*8.13 Outline Employment and Skills Plan [REP5-215]* Plans must explicitly demonstrate how local communities in places like East Anglia (e.g., Norwich to Tilbury and Sea Link projects) will benefit from direct hiring and training The Plan sets out the intention to prepare activities to support skills and employment, but does not provide any detail to enable District specific comment, so detailed workforce data, such as role profiles, skills requirements, workforce numbers and durations are necessary before more detailed feedback can be provided. The plan states that information will include: • preparing a project-specific approach to workforce planning and recruitment in advance of construction (from 2027), informed by engagement with local authorities, employability services and training providers across Norfolk, Suffolk and Essex (including Thurrock); • promoting awareness of project-related jobs, apprenticeships and training opportunities through established local channels, including local authorities, job-brokerage services, further education colleges, Skills Bootcamps and apprenticeship services; would be good to have explicit mention of DWP and Work Coaches. • signposting GGP contractors and supply-chain partners to relevant local apprenticeship, vocational and adult-learning provision to support recruitment and upskilling aligned with project roles; • encouraging contractors to adopt inclusive and accessible recruitment practices consistent with National Grid's equality, diversity and inclusion commitments, including the use of open recruitment approaches to reduce barriers for under-represented groups; • supporting engagement with local employability and training programmes that assist people facing barriers to work, where relevant and appropriate; • coordinating employee-volunteering activity, including schools, careers and employability engagement, through National Grid's existing Volunteering Works programme and equivalent contractor initiatives The plan currently doesn't make reference to encouraging work experience for school/college students and DWP clients, and we believe that this is an essential part of any final plan. It is essential that there are District specific details so that likely demands for workers and possible opportunities/impacts on the local labour force can be assessed. It is desirable at this stage to have some details to see how recruitment will be tailored to attract staff from each District area along the route showing the link with existing labour market pressures and skills shortages or availability. The role titles listed in the skills plan are a mix but some focus on site management, environmental assessment and skilled construction roles plus entry level/lower skilled – site security, catering, welfare, fencing and admin. The latter roles are often a good match for DWP clients seeking entry level roles, but without details of hat those roles involve (JD's) this is difficult to assess.	The Councils accurately summarise some of the outline measures set out within Section 6 of **8.13 Outline Employment and Skills Plan [REP7-489]** (OESP). The Applicant notes the Councils also highlight the need to reference encouraging work experience for schools and colleges; engagement with local education providers, delivery of STEM/STEAM sessions in schools and colleges, support to young people studying T-levels or similar, careers fairs and so on are already referred to in paragraph 6.2.26 of the OESP. As an Outline Plan, the measures are not intended to be comprehensive. The Final ESP will provide greater detail which could include the delivery of work experience opportunities if agreed in consultation with local education providers. Paragraph 6.2.31 of **8.13 Outline Employment and Skills Plan [REP7-489]** refers to the Applicant's GGP contractors adopting recruitment approaches that consider local labour markets including engagement with existing job-matching and employment support services including job centres. This could include Department for Work and Pensions (DWP) clients.

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REP7-542	Babergh and Mid Suffolk District Councils	*8.13 Outline Employment and Skills Plan [REP5-215]* *Supply Chain* The Skills Plan identifies that Suffolk exhibits higher-than-average concentrations in construction-related, transport and manufacturing activities, and additionally shows a stronger concentration of employment in the electric power generation, transmission and distribution sector than the national average. This indicates that the Suffolk local economy has established supply-chain strengths in key sectors that are relevant to, and could benefit from, the proposed Norwich to Tilbury development. The ability for Babergh and Mid Suffolk supply chain businesses to take advantage of this is dependent upon the availability of a robust and phase-specific evidence base for the development so that supply chain actions can be planned and implemented effectively. We will need a clear understanding of the types of goods and services required, the capacity and capability of businesses within a defined geographic area (Mid Suffolk and surrounding area - hyper-local, local and regional), and the likelihood of these businesses being able to respond to demand across different phases of the Project. The OESP does not provide a sufficiently detailed phase-specific assessment of supply chain requirements, nor does it consider the likelihood or the probability of local and regional supply chain participation. Without this information it is not possible to assess the scale of opportunity or the potential impacts on local business capacity. The OESP identifies potential future activities, it does not identify forecast workforce demand (other than at a very strategic level) and the scale or type of training, employment or supply chain support required. Without this it is not possible to assess whether the proposed strategic measures will be deliverable or sufficient to address identified/possible skills gaps.	**8.13 Outline Employment and Skills Plan [REP7-489]** is an outline document and as such, its purpose is to set the scope for the preparation of the Final ESP which will include further detail on matters such as workforce profile, type and duration of jobs, skills and supply chain requirements. Section 6.3 of the OESP outlines the measures that the Applicant will take to maximise sub-contract spend within the Study Area (which covers Norfolk, Suffolk and Essex (including Thurrock)). Measures include working in partnership with existing supply chain organisations. Paragraph 6.4.2 of **8.13 Outline Employment and Skills Plan [REP7-489]** states that the Applicant (National Grid) and its GGP (Main Works) contractors will work with the Regional Skills Coordination Function (RSCF) to profile the number, type and duration of construction jobs and supply chain requirements. This will include for a description of the relevant skills and experience required for different roles to be provided in advance of construction commencing. Socio-economic effects, including in relation to the local economy, are assessed in **6.15 Environmental Statement Chapter 15 Socio-economics, Recreation and Tourism [REP7-296]**.
REP7-545	Braintree District Council	*REP6-075 - 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (Tracked) (Final Issue C)* The Council would like to take this opportunity to comment on the Outline Soil Resource Plan (REP6-075) submitted at deadline 6. Whilst the Council acknowledges that the updated Outline Soil Resources Plan (oSRP) represents an improvement and reflects ongoing engagement during the Examination, a number of points remain unclear in relation to the proposed soil survey methodology, baseline assessment and restoration objectives. In particular, the Council is concerned that Paragraph 1.9.3 appears to conflate a Soil Resource Survey (SRS) with soil sampling and laboratory analysis. The surveys described within the document are understood to comprise soil sampling and analysis in accordance with Natural England Technical Information Notes TIN035 and TIN036. However, these activities do not in themselves constitute a Soil Resource Survey. A Soil Resource Survey would ordinarily identify soil types, profiles, structure, distribution and available soil volumes, and is typically undertaken using methodologies broadly consistent with Defra guidance. The Council considers that the oSRP should more clearly explain how Soil Resource Surveys will be undertaken and how the results of the Agricultural Land Classification surveys will be used to inform this process. The Council also considers that the distinction between a Soil Resource Survey and a Soil Health Assessment is currently insufficiently clear. Paragraph 1.9.3 refers to the use of the Visual Evaluation of Soil Structure (VESS) methodology and the assessment of nutrients, organic matter and pH. Whilst these measures may assist in establishing baseline soil health conditions, they do not provide the information necessary to identify and quantify soil resources present on site. The Council therefore considers that the	**7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [REP7-326]** includes updates made following consultation meetings with Braintree District Council to cover the following points: • Reference to reinstatement to previous condition now includes specific reference to the preconstruction condition including the preconstruction ALC grade, ensuring that no downgrading of land upon reinstatement will occur • Addition of specific details of the post-submission / preconstruction surveys which will be undertaken, ensuring that there is clarity and agreement on what these surveys will cover and the survey methodology which will be used • Addition of clarity that the existing ALC maps will be updated with the preconstruction survey data to ensure the project has a full ALC dataset. These changes provide clarity on the commitments already given and detail on how future surveys will be undertaken (above and beyond simple references to published guidance). These changes have enabled the SoCG with Braintree District Council (**5.9.9 Draft Statement of Common Ground - Braintree District Council [REP7-110]**) to be updated and, whilst some issues remain under discussion, Braintree District Council welcome the changes made and considers the remaining issues can be addressed through further clarification and refinement of the survey methodology, which would address the matters Braintree District Council have raised in REP7-545.

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		document should clearly separate Soil Resource Survey requirements from any Soil Health Assessment and explain how the various survey outputs will be used. Furthermore, whilst the document proposes a baseline assessment of soil structure and condition, it remains unclear whether these parameters will form part of the success criteria against which reinstated land will be assessed following construction. The Council considers that the oSRP should clearly identify the baseline conditions to be established prior to construction and confirm how these will be used to demonstrate successful soil restoration and reinstatement. Finally, the Council considers that the aftercare objectives should explicitly require reinstated land to be returned to its pre-construction condition, including restoration of the pre-construction Agricultural Land Classification grade where applicable, together with the condition required to support the intended future land use. The Council would welcome amendments to the oSRP to provide this additional clarity. Subject to the above matters being addressed, the Council considers that the underlying principles of the oSRP are generally appropriate; however, further clarification is required to ensure that soil resources are adequately characterised, protected and restored throughout the lifecycle of the Project.	
REP7-547	Burstall Parish Council	Document: 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report - Tracked Changes Version. Final Issue B. July 2026. Planning Inspectorate Reference: EN020027 This document downplays, underestimates and undervalues the natural and historic landscape of Burstall, Flowton, Bramford and Sproughton and their surrounding parish areas. As set out below, it fails to include significant and rare features, the safeguarding of will require a re-routing of the pylons as previously proposed by Burstall Parish Council (BPC). Given the pylon route proposed by NGET, and the inadequacy of responses we have had to previous feedback concerning the pylon route south of the Bramford substation, the topic is of great significance and the document represents a major oversight. If the document had correctly represented the significance of the natural and historic landscape, then it would support the case for an amended route selection. The document is extremely large and hard to search, however, of significance, we can find no mention of the following, which must be taken into account and offered the correct level of protection: 1. The Service Tree located in Burstall Long Wood, which is a rare indicator of the significance of the ancient woodland blocks south of the Bramford Substation (Bullen Wood, Round Wood, Elms Grove and Burstall Long Wood) and the need to protect and enhance the wildlife corridors which exist between them and to ensure sufficient buffer zones around them. 2. The ancient and historic tree lined sheep droving route of Cook's Lane running west of Elms Grove, including an ancient marker stone signifying the hundred or parliamentary boundaries. 3. The remaining ancient hedgerows and copse in the fields south of the Bramford Substation, identified in the earliest maps. The current pylon route south of the Bramford Substation unnecessarily traverses these areas, cuts through the the wildlife corridor between Bullen Wood and Round Wood and offers very little buffer zone as it passes close in to the east of Round Wood and Burstall Long Wood.	The historic environment of Burstall and surrounding Parishes has been assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [REP7-244], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [REP7-254]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [REP7-240]**. The Applicant considers the assessment to be proportionate and appropriate within the DCO framework. This is reflected in document **5.9.6 Signed Statement of Common Ground – Babergh and Mid Suffolk District Council [REP7-104]**, which records the District Council's agreement with the assessment. The Applicant seeks to reassure Burstall Parish Council that the presence of ancient woodlands and the associated green corridors, has been a key consideration is routeing and siting and every effort has been made to avoid impacts to these irreplaceable habitats and green corridors. Potential impacts and mitigation measures on ancient woodlands have been set out within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP7-346]**. No works will be undertaken within or within the 15 m root protection zone of Bullen Wood, Burstall Long Wood or Elms Grove Ancient Woodlands. Mitigation measures to ensure no accidental encroachment into the above-mentioned ancient woodlands, have been included within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP7-346]**. The existing 132 kV overhead line (PHB Route) that oversails Round Wood Ancient Woodland will be removed by the project (having an overall beneficial effect) and then undergrounded outside of the 15 m root protection zone from Round Wood. No other works will be undertaken within Round Wood by the Project.

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		If as suggested by BPC, an eastern exit from the substation north of Bullen Wood was taken, the ancient hedgerows and copse in the fields south of the substation, and Cook's Lane would be protected. And, if pylons 7, 8 and 9 were routed only a few hundred metres further east, a sufficient buffer zone past the ancient woods containing Service Tree, would be achieved. The marked photo below shows the area and features. The blue lines outline the ancient woods, hedgerows, copse and wildlife corridors of significance that link them. The red line is the current proposed pylon route which crudely dissects the area, takes no account of the features and hugs the ancient woodland. The green line represents the suggested route, exiting the substation east using GIL then routes south giving an adequate buffer as it passes the ancient woodlands with a gap. Note the green shadows/ lines in the fields directly south of the substation, showing historic hedgerow field boundaries, still in use as wildlife corridors (not marked blue as this would hide the feature from view on this photo). The below link provides an overhead view of Cook's Lane looking east towards the ancient woodlands.https://burstall-pc.gov.uk/assets/Uploads/Drone-Footage.mov	
REP7-579	Catherine Hill	I am adding to my objections for the overhead Pylon proposal close to my home and Remus Animal Sanctuary. Last night my partner was walking our dog and right next to the NG bore hole he saw a badger, we are going to monitor this as not only are NG causing stress to animals in the Remus animal sanctuary, they are threatening the surrounding nature. We have tried to talk to them and get a meeting with Remus Animal Sanctuary but have had no response. We were not informed they were doing bore holes with access down our private track until they left their cones out. NG do not interact , their sub contractors turn up and have to take the brunt of unhappy residents and landowners.	A full range of ecological surveys, including badger surveys, have been undertaken across the Project and potential impacts assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [REP7-186]**. Mitigation measures have been developed and set out in **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** and **7.2 Outline Code of Construction Practice [Revision H]** to ensure no harm to wildlife, including badgers, during construction. Ground Investigation Surveys have taken place on land around the Remus Memorial Horse Sanctuary, the access route for these works would have been agreed at a site meeting with the contractor and landowner. The landowner's representative would have been notified of the surveys. As it stands, there are no further surveys currently planned, however if there is a requirement for further surveys, notification will be made to the AP. Where survey access is required the Applicant will seek to engage with landowners and occupiers to agree a voluntary survey access licence to facilitate the works. The Applicant through their agents Fisher German liaise directly with landowners and the contractor to ensure access provisions are agreed and then maintained throughout the works period. In instances such as this where there are third party concerns then the Applicant and their agents will seek to work collaboratively with the third party to alleviate the concerns they may have through their team of Agricultural Liaison Officers, notwithstanding, in this case the Applicant believes that no specific rights to use the access track were required from the IP.
REP7-580	Charles Micklem	In Document 8.5.13 – Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4, National Grid states: "Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route." This supports the point we have consistently made throughout the examination regarding the proposed mix of tall and short pylons across the Langleys Estate. In our view, a continuous line of pylons of the same height and design would be far less visually intrusive than a route where the structures repeatedly change in height. Those	The Applicant notes the respondent's preference for a uniform line of standard-height lattice pylons, which they consider would achieve a better overall landscape and visual outcome. In terms of landscape and visual effects, the Applicant has noted previously that low height pylons provide some advantage for visual receptors within the settlements at the Walthams, in some views from the RPG, and for more distant receptors. This is due to the increased likelihood of the pylons being screened or filtered in views due to both their lower height and the intervening screening from existing vegetation between the receptors and the Project. It has been noted previously that the shorter, wider and bulkier appearance of low height pylons is generally less beneficial for closer receptors, including receptors in nearby residential properties. Transitions between pylon types are generally less preferred in landscape and visual terms if they can be avoided. In this case, the considerations extend beyond landscape and visual matters, with heritage concerns being the key driver for low

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		changes naturally draw the eye and make the overhead line more noticeable. A uniform line of standard-height lattice pylons would create a more consistent feature within the landscape and, ultimately, have a lower visual impact. For that reason, we continue to ask National Grid to replace the proposed short pylons with standard-height pylons. We recognise that this would increase the impact on Langleys Registered Park and Garden. However, as the owners and custodians of the parkland, we would support this approach because we believe it would achieve a better overall landscape and visual outcome.	height pylons. With regard to the historic environment, the Applicant has responded to a similar comment from the IP in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**.
REP7-580	Charles Micklem	In the same document, National Grid also states: "However, the focus at this time continues to be the matters that should be negotiated as part of HoTs rather than simply practical matters that would be dealt with through the usual agricultural liaison / pre-entry schedule of condition workstream at the commencement of main works." This is not our experience. The issues we have been waiting months to receive answers on are not simply "practical matters". They include fundamental design issues such as permanent access arrangements, replacement tree planting, landscape mitigation and other matters that directly affect the Heads of Terms. The questions we raised during our meeting on 1 June were not answered until 21 July, almost seven weeks later. We then raised further questions at a meeting on 8 July, and at the time of writing we are still waiting for responses. It is difficult to describe this as meaningful engagement when key questions affecting both the design of the scheme and the Heads of Terms remain unanswered for such long periods.	The Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and regular twice weekly meetings are conducted to triage, seek to identify common themes across PILs and identify and seek the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process and does not anticipate that the register will close for requests and consideration in the future.
REP7-580	Charles Micklem	I have also reviewed Document 6.11.A1 – Environmental Statement Appendix 11.1: Historic Environment Baseline Report (Revision B). Nowhere within that report can I find the desktop assessment of Langleys that National Grid repeatedly refers to. The report contains no description of the internal layout of the house, yet National Grid has reached conclusions about the effectiveness of mitigation in relation to the building. Without understanding the layout of the principal rooms, it is difficult to see how National Grid can properly assess the impact on views from within the house or conclude that the proposed mitigation is adequate. This issue was also raised by Historic England in REP5-250, where it stated: "During the Issue Specific Hearing on 29 April... the applicant commented on the views from ground and principal first floor rooms... We consider it might be helpful to the ExA if the applicant provided more clarity on these views and their position." National Grid responded in Document 8.4.14, stating that: "...on the basis of desk-based research the Applicant understood that there are no significant rooms designed to have group functions, such as long galleries, on an upper floor from which views might be an important additional consideration." Despite making this statement, National Grid has still not provided the evidence or desktop research that supports this conclusion. What makes this even more surprising is that National Grid has visited Langleys on three separate occasions, including two meetings and one accompanied site visit. At no point did anyone ask about the layout of the house, the location of the principal rooms or which rooms are historically significant. As the owners of Langleys, we have attempted to carry out our own desktop research and, despite knowing exactly what we were looking for, we found very little information about the house and nothing that identified the internal room layout. It is therefore difficult to understand how National Grid has been able to reach such definitive	The desktop assessment to which the Applicant is referring to is the assessment detailed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [REP7-244], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP7-254]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [REP7-240].** There is no specific, standalone assessment of the Langleys estate. With regard to the internal layout of the listed building, the Applicant made use of the available information online, including the National Heritage List for England, and found no evidence to indicate the presence of principle rooms such as those used for communal purposes e.g. long galleries on the first floor to the rear of the house.

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		conclusions based solely on desktop research when it has been unable to produce that research or explain its methodology.	
REP7-580	Charles Micklem	National Grid also confirms within this document that the Section 172 notices were served. However, I remain concerned about whether those notices were served lawfully. One notice was served on the landowner but not on the occupiers, despite the legal requirement to do so. Another included land that we had already informed National Grid, both in meetings in April and again in June, that we did not own. Once again, this suggests that statutory notices were issued without first ensuring the information was accurate, only for National Grid to amend its position once the errors had been pointed out. Furthermore, as recently as 8 July, the original notice remained attached to a pole on our land despite National Grid maintaining that it had not been placed there and despite us informing them on several occasions that it was still displayed.	During the meeting held on 8 July 2026 with Mr Micklem, the notices were discussed and actions were circulated following this meeting. This explained that the s172 notices are being issued as a procedural step to ensure that the Applicant has a legal avenue to take access for any required GI surveys and any associated pre-requisites. The notice is not an end to voluntary negotiations and the Applicant will continue to be transparent with Mr Micklem about intentions regarding GI surveys. It is understood that Mr Micklem has since voluntarily signed two survey access licences and the parties are in regular contact to move matters forward.
REP7-580	Charles Micklem	In Document EN020027-003972-8.5.10 – Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3, National Grid states: "From the information supplied by the affected person, the applicant's understanding is that the regulations and legislation concerning boreholes / spreading organic matter apply only where boreholes are being conducted to extract and supply water for human consumption." While that interpretation is based on one of the documents I provided, it does not address the second document I submitted: DEFRA's Code of Good Agricultural Practice for Farmers, Growers and Land Managers. That guidance simply states that organic manures should not be spread within 50 metres of a borehole. It makes no distinction between boreholes supplying drinking water and boreholes used for other purposes. I am therefore concerned that, because National Grid does not agree with the evidence, it has said it will produce its own position statement. In effect, National Grid will be interpreting the guidance in a way that supports its own proposal. However, even if National Grid concludes that spreading organic matter close to the borehole is acceptable, that does not solve the real problem. If Anglian Water takes a different view and refuses to spread organic matter within the affected area, we will still suffer the consequences. We would lose access to an important source of organic matter, increasing our costs and reducing our ability to maintain soil health. Unlike many services, we cannot simply use another supplier. Anglian Water is the only operator in our area providing this service. If it cannot continue to spread because of the presence of the borehole, National Grid's proposed mitigation effectively amounts to accepting that we lose that benefit. That is not mitigation—it simply transfers the impact of the project onto us.	The Applicant notes the AP's concerns and is reviewing the position of the various stakeholders in respect of the spreading distances from boreholes. This item will continue to form part of ongoing discussions with the AP. The Applicant confirms it is continuing to work to find an acceptable resolution. The Applicant recognises the importance of maintaining farm operations during construction. Detailed construction methodologies, programme sequencing and access arrangements will continue to be refined during the detailed design stage and through ongoing engagement with affected landowners. The Applicant will seek, where reasonably practicable, to minimise disruption to farming activities and provide appropriate notice of construction activities.
REP7-580	Charles Micklem	Finally, although the pre-entry planning applications do not form part of the Development Consent Order, they provide a good example of how National Grid's "landowner engagement" has operated throughout this project. National Grid and Fisher German assured us that they wanted to work collaboratively with us on these applications. We met with them on 8 July, and part of that meeting was dedicated to discussing the proposed works. We are still waiting for a response to the points raised.	The Applicant does not agree that engagement with Mr Micklem or other landowners has been undertaken as a procedural exercise. The Applicant has engaged extensively with affected landowners throughout the development of the Project, and has sought to discuss and understand site-specific concerns, including in relation to the proposed enabling works referred to by the Affected Person. To support the phasing of construction, the Applicant is considering submitting separate planning applications to local planning authorities for certain small-scale, localised enabling works. However, contrary to the suggestion made in the representation, the Applicant has not submitted a planning application to Chelmsford City Council in respect of the proposed

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		However, I have since discovered that National Grid had already submitted the planning application to Chelmsford City Council on 6 July (Planning Reference 6/00921/EIASO)—two days before meeting with us. This means the application had already been submitted before they came to ask for our views. It is difficult to believe that our comments were ever intended to influence the proposals when the planning application had already been lodged. For me, this perfectly summarises our experience of negotiating with National Grid throughout this process. They give the impression that they are listening, but the decisions have already been made. This planning application demonstrates that consultation has too often been treated as a procedural exercise rather than a genuine opportunity to engage with landowners and consider changes to the scheme.	enabling works. Rather, the Applicant has submitted a request for an Environmental Impact Assessment (EIA) screening opinion. This is a procedural and statutory step which is separate from, and precedes, any planning application, which is still being developed. The submission of an EIA screening request does not preclude ongoing dialogue regarding the proposed works, nor does it prevent comments received from landowners from being considered in the development of any future planning application. The Applicant notes that any such applications would be separate regulatory processes and do not form part of the DCO application. Nevertheless, the Applicant has continued to engage with the Affected Person and remains willing to discuss the matters raised. The Applicant recognises that agreement has not been reached on all issues; however, this should not be taken as evidence that representations have not been listened to or considered. Engagement has been undertaken in good faith throughout the Project and has informed the refinement of the Project where appropriate.
REP7-581	Clarke and Simpson, Brooks Leney, Durrants, Whirledge and Nott clients	*Heads of Terms Engagement* We have previously set out the timetable of meetings we have had in our Deadline 6 response and do not propose to include that again now. Our view on how discussions have progressed with National Grid has not changed. Since Deadline 6 we met with representatives from National Grid and Fisher German following the issue of the revised Version 3 of the draft Heads of Terms for voluntary acquisition of rights. Discussions took place and some of the issues raised by us have been accepted and amended within the draft Heads of terms. For example, we are pleased National Grid has removed the term “best endeavours” and replaced with “all reasonable endeavours”. However, this is one point of concession against the many points that we still have issues with, and we have fed this back to National Grid. Our outstanding points are: • The Heads of Terms restrict landowners from participating constructively in the DCO process. • The assignment provisions are too wide. National Grid already has sufficient rights to assign to Ofgem-licensed entities. A general ability to assign to any party goes beyond what is necessary. • The provisions relating to schedules of condition lack sufficient detail, particularly in relation to soil testing and baseline soil condition. • The Heads of Terms should expressly state that they do not override statute and that landowners remain entitled to any compensation available under statutory provisions for Heads of Claim including Severance, Injurious Affection and Disturbance. • There is no clear confirmation that landowners can submit annual claims for crop loss and disturbance. If claims must wait until the end of the proposed 5-7 year project, this will significantly affect cash flow. • There is no longstop date requiring National Grid to complete the Deed of Grant. National Grid should not be able to install or energise equipment without completing the deed and paying the balancing payment. • Clarity is still required on safe working distances beneath overhead lines. If land beneath the lines cannot be safely worked, compensation must reflect the full sterilised area, not just the tower bases. • Further information is required on irrigation beneath the lines.	The comments regarding Deadline 6 [REP6-174] responses are noted by the Applicant and it is further noted that the Applicant responded to these points at Deadline 7 in document **8.4.17 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points [REP7-482].** The Applicant notes that the AP has confirmed that over the course of the negotiation process that remains ongoing, there have been concessions on the terms offered in order to seek to acquire rights on a voluntary basis. The Applicant has been actively engaged in discussions with the agents to provide comfort on a number of points raised by the agents. A template detailing these amendments was presented to the agents on 13 July 2026, with meetings to discuss further details held on 14 July 2026 and 15 July 2026. The Heads of Terms remain subject to ongoing discussion and negotiation with affected landowners and their representatives, and the Applicant continues to engage constructively to seek resolution of outstanding points. The Applicant considers that the provisions proposed are appropriate and proportionate to secure the land rights required for the construction, operation and maintenance of the Project, whilst protecting the interests of affected parties. Matters relating to endeavours, obligations, assignment provisions, schedules of condition, compensation entitlement, crop loss and disturbance claims, deed completion arrangements and other drafting points remain under active review and discussion between the parties. The Applicant notes that entitlement to compensation is governed by the statutory compensation code and is not displaced by any voluntary agreement. In relation to agricultural matters, the Applicant recognises the importance of issues such as soil management, drainage, irrigation, biosecurity, records of condition and reinstatement. These matters are being considered through ongoing engagement with landowners and their advisers and, where appropriate, are addressed through **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [REP7-326],** requirement provisions and project-specific discussions. The Applicant will continue to engage with the representatives of affected landowners to seek agreement on these matters and to progress voluntary agreements wherever possible. Many of the points raised here have been addressed in the recently re-issued version 3 Head of Terms and the Applicant’s position confirmed at the meetings with the agents held on 14 July 2026 (Brooks Leney) and 15 July 2026 (Clarke & Simpson, Whirledge & Nott) as referenced above. These include:

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		• Further information is required on excavation depths and working distances, particularly where quarrying operations are affected. • The definitions remain unclear and inconsistent in places. • The temporary compound lease Heads of Terms omit several basic commercial lease provisions, including insurance, indemnity, dispute resolution, drainage, services, pollution controls and CPI review. We are also concerned we have not seen any draft Code of Construction Practice. With regards ongoing discussion with National Grid and Fisher German, we have recently been informed that there is now very little opportunity for any further negotiations or revisions of the terms as they now stand.	• Replacing 'best endeavours' with 'reasonable endeavours'. • The Applicant does not agree that the Heads of Terms restrict landowners from participating constructively in the DCO examination process. Landowners and their representatives have actively engaged throughout the Examination, submitting representations and comments on matters relevant to their land interests. The Applicant welcomes and continues to consider land-specific feedback and practical matters raised in relation to individual holdings. The assignment provisions have been clarified. • The Applicant has submitted **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [REP7-326]**, as part of the DCO examination which should provide further comfort on soil management. • Clarification that any future compensation claim should be brought pursuant to the Compensation Code. • A suite of documents available on the Applicant's website and on the Norwich to Tilbury Project page on the Planning Inspectorate Website (submissions relating to the Applicant's application for development consent) were shared with the land agents via email on 13 July 2026 to clarify points, including safe working distances and the soil resource plan. It is the Applicant's intention, that hyperlinks or reference to these documents will be shared again when the V3 Heads of Terms are sent to individual landowners. • A summary on the restrictions related to quarrying in proximity to pylon bases was provided via email to a representative of Brooks Leney on 14 July 2026. Further information can be found in the documents shared via email on 13 July 2026. • Definitions have been revised in the latest drafting. • If an AP has a compound lease impacting their land, the AP's agent can request a copy of this on a case-by-case basis, which will provide the necessary information where applicable. In relation to the fourth bullet point above, there are a number of resources on the Norwich to Tilbury Project page on the Planning Inspectorate Website and the Applicant's website which provide comfort on concerns raised by the AP's agent (these include, the **7.2 Outline Code of Construction Practice [REP7-322]** (to be updated by **[Revision H]** at Deadline 8), **Appendix C - Outline Soil Resource Plan [REP7-326**], **Appendix D - Outline Dust Management Plan [REP7-328]**, Guidance on Land Rights for New Electricity Transmission Assets (England and Wales), Design guidelines for development near pylons, and high voltage overhead powerlines, and Land Rights Strategy and Payment Schedule for Assets. A hyperlink to a number of these have been provided to the AP's agents who submitted this response via email on 13 July 2026.
REP7-581	Clarke and Simpson, Brooks Leney, Durrants, Whirledge and Nott clients	*Draft Deed of Easement* In the latest draft National Grid have not taken on board our major concerns over the permanent restrictions they propose to impose on landowners. The proposed restrictions include the control of vegetation within a 30m radius of a pylon base, including arable crops, which is far too restrictive and prevents our clients from growing any crop taller than 1m in height. National Grid has, to date, been unable to provide adequate explanation of why this, and other restrictions, are being sought or to provide information of where these restrictions are located within the draft DCO. From our research we cannot see these restrictions in the draft DCO document, the Schedule of Rights or in the Book of Reference. Many of us have been involved with National	The Applicant notes the concerns raised regarding the draft Deed of Easement. The Heads of Terms version 3 that has now been issued to the agents clarifies the position regarding a number of points relating to drafting contained within the Deed of Easement. Once an agreed position has been reached on the Heads of Terms, solicitors will be instructed by both the Applicant and on behalf of the APs' clients to negotiate and finalise the Deed of Easement, which is standard practice on DCO schemes of this nature. The Applicant considers that the rights sought are necessary and proportionate to facilitate the construction, operation, inspection, maintenance, repair, replacement and renewal of the Project, and are consistent with the rights sought through the DCO application. The precise terms of any voluntary agreement, including provisions relating to access, use of technology, operational restrictions and landowner protections, remain subject to ongoing

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		Grid's Bramford to Twinstead scheme, and none of these restrictions are in the easement documentation for that, similar, scheme. National Grid has drafted that arable crops over 1m tall will be permitted to be grown, but only with National Grids consent. There has been no explanation as to how National Grid will deal with multiple consents in a short period of time from a large number of affected landowners each and every year. This will put huge strain on crop rotation planning and will disadvantage landowners compared to unaffected neighbours who are not limited to their cropping rotation. There has been little explanation regarding technical restrictions relating to heights of cables in relation to farm machinery. A combine harvester with a grain tank lid and auger can exceed 5.7 metres in height. HSE guidance refers to minimum line heights from the ground of around 7.3 metres. Without clear information, landowners cannot properly understand whether normal farming operations can continue safely beneath the lines. In addition to the matters above, we have asked National Grid to confirm where the following matters are situated in the draft DCO application. It is quite reasonable that we and our clients should be able to compare the rights being sought compulsorily with those being offered through voluntary agreement: • alienation • the Grantor's retained rights • the rights to be granted to the Grantee • the rights to be included within the deed of easement • the final easement area • cable depth • restrictions on use To date we have not been provided with the location of these matters within the draft DCO but National Grid.	engagement and negotiation. The Applicant will continue to discuss these matters with affected landowners and their representatives to seek to address site-specific concerns where appropriate. The Applicant acknowledges the concerns raised regarding farming operations, vegetation management, crop restrictions and compensation. The extent of any operational restrictions will depend on the specific circumstances of the affected land and infrastructure, and any entitlement to compensation will be assessed in accordance with the statutory compensation code and the terms of any agreed voluntary rights.
REP7-581	Clarke and Simpson, Brooks Leney, Durrants, Whirledge and Nott clients	*UKPN* Since Deadline 6 we have met with UKPN's agents, Dalcour Maclaren. However, they have not produced any Heads of Terms nor any detailed plans of the works they propose. They have informed us that, the proposed easement payment will be based on a lower percentage than that being offered by National Grid. However, they have been unable to provide any explanation as to why there is a differential. In some circumstances, the UKPN works are more disruptive than the National Grid works and as such, without detailed information on the nature of the proposed works, landowners cannot adequately assess the impact of the works on their land and livelihoods. Dalcour Maclaren have said they hope to have the detailed information available in early August. However, this is far too close to the end of the examination to be of any assistance to our clients in reaching an informed decision on whether to enter into a voluntary agreement. Under the terms proposed National Grid are removing themselves from the responsibility of claims regarding third party works, such as UKPN's works. This causes us concern regarding any claim for damage due to the possibility of being unable to reach agreement or the third-party not accepting responsibility for damage. We cited the example of damage as a result of the haul road being used by National Grid and third parties continuously through the project. This leaves landowners in the uncertain position where it may be difficult to define which party actually caused damage, due to	As previously explained by the Applicant in **8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [REP6-116]**, and reflected in the UKPN engagement reporting within the Detailed Land Rights Tracker, UKPN's engagement and negotiation strategy does not follow the same sequencing as the Applicants process. In particular, UKPN's Heads of Terms are generally issued at a later stage in its engagement process and following further technical development of the requirements for its works. The absence of UKPN Heads of Terms at this stage should not therefore be interpreted as an absence of engagement or a lack of intention to pursue voluntary agreements. UKPN has continued engagement with affected persons and their representatives, including through its appointed agents, while progressing the technical information required to support those discussions. The Applicant further notes the comments regarding the level of detail currently available for UKPN works. UKPN is responsible for the development and presentation of its own technical requirements and land agreements. The Applicant understands that further information is intended to be provided as the design and land requirements are refined. In parallel, the Applicant and UKPN continue to coordinate their engagement activities with affected persons and land agents to ensure, so far as reasonably practicable, a consistent and joined-up approach to land rights acquisition and stakeholder engagement.

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		multiple party's use of the haul road, thereby leaving the landowner with the issue of establishing which party are responsible for the damages, and therefore should have a compensation claim made against them. Should this situation arise under compulsory powers, as the acquiring authority within the DCO, any claim would be made to National Grid. *Conclusion* The vast majority of our Deadline 6 comments remain. The rights being sought through voluntary acquisition are too restrictive and onerous on landowners. We hope this information is useful to the Planning Inspectorate to demonstrate our position	In relation to compensation and liability matters, compensation entitlement arising from the exercise of compulsory acquisition and temporary possession powers is governed by the relevant provisions of the DCO and the applicable compensation code. The Applicant does not agree that landowners would be left without recourse in the event of loss arising from authorised activities. Any claim would fall to be considered against the party responsible under the relevant legal framework and facts of the particular case. The Applicant and UKPN will continue to engage with landowners and their representatives on these matters.
REP7-550	Defence Infrastructure Organisation	*East 2 WAM Network Statutory Technical Safeguarding Zones* The MOD has completed further technical assessments of the proposed development and have been able to define maximum height thresholds for the sections of the proposed overhead line development corridor in specific areas where it will pass beneath microwave links that form part of the East 2 WAM Network. Following constructive engagement with the applicant, the wording of two Requirements (Requirements 18 and 19) has been agreed between the applicant and the MOD for inclusion in the draft Development Consent Order to implement these defence safeguarding requirements as set out in Annex A attached to this letter. *Wattisham Station Statutory Aerodrome Safeguarding Zones* The MOD has completed further detailed assessments which, taking account of the LoD proposed, have identified that the proposed development could impact upon the effective operation of the Precision Approach Radar (PAR) and infringe the critical airspace encompassing Wattisham Station. To maintain the safe and effective operation of the PAR at Wattisham Station, the MOD has defined a need for the vertical LoD to be removed within a specific area, defined a maximum height threshold applicable in 2 specific areas to safeguard the critical airspace encompassing Wattisham Station, and defined a need for a Temporary Structure Deployment Management Plan to ensure construction operations will not adversely affect the operation of Wattisham Station. The MOD and the applicant have agreed the wording of provisions to implement these defence safeguarding requirements. Annex B details the agreed wording as set out in the **draft Development Consent Order (Document Ref 3.1, Revision F) [REP6-030]** at Schedule 3, Requirements:- Temporary Structure Deployment Management (Requirement 16); Wattisham Station Aerodrome Obstacle Limitation Surfaces (Requirement 20); and The addition of sub paragraph (5) at Part 2, Principal Powers, 5 – Limits of Deviation – to address the potential for the proposed development to impact upon the operation of the PAR at Wattisham Station. *Military Low Flying Training Areas* The proposed development occupies Low Flying Areas 5 and 10 (LFA 5 and LFA 10) within which military aircraft may conduct low level flight training. To maintain the safety of aircraft operating at low levels, the MOD has identified a need for details of new pylon structures and removal of existing pylon structures to be submitted to ensure aviation chart information can be updated on a timely basis. In addition, the applicant proffered a Requirement to submit prior notifications of the deployment of cranage via the Civil Aviation Authority (CAA) for the entire development. The MOD and the applicant have agreed the wording of Requirements to deliver both of these provisions.	The Applicant was pleased to receive the Ministry of Defence's letter of 20 July 2026 confirming the withdrawal of their statutory safeguarding objection to the Project. This followed close collaboration between the Applicant and the Ministry of Defence to ensure the agreement of appropriate mitigation of assessed Project impacts on defence interests including the East2WAM Network, Wattisham Station military aerodrome and military Low Flying Areas. The agreed provisions to secure the Applicant's commitments had been included within **3.1 Draft DCO [Revision H]** at Deadline 7 as drafted and described within Annex A, B and C of the 20 July 2026 letter. **8.3.39 Signed Statement of Common Ground – MOD DIO [REP7-439]** confirms the resolution and agreement of all outstanding matters between the Applicant and the Ministry of Defence.

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		Annex C details the agreed wording as set out in Schedule 3, Requirements of the draft Development Consent Order (Document Ref 3.1, Revision F) [REP6-030], for Cranage Deployment Notification (Requirement 17) and Ministry of Defence Aviation Charting and Aviation Safety Management (Requirement 21) which address the need for aviation charting and aviation safety management.Conclusion In summary, subject to the amended Requirement wording set out at Annex A of this letter being implemented in lieu of the existing Requirements 18 and 19 wording as set out in the current **draft Development Consent Order (Document Ref 3.1, Revision F) [REP6-030],** and the retention of the wording of Requirements 16, 17, 20 and 21, along with sub paragraph (5) of Limits of Deviation as already set out in the applicant's **draft Development Consent Order (Document Ref 3.1, Revision F) [REP6-030]**, the MOD is content to withdraw its statutory safeguarding objection to this application.	
REP7-553	Essex County Council	*Highways and Transportation* *DCO Draft [REP6-031]* ECC needs to highlight that the Traffic Regulation Orders (TRO) referred to in Article 49 of the DCO, and set out in Schedule 13, have not been agreed; and the road closures referred to in Article 16 of the DCO, and set out in Schedule 8, have not been agreed. At Deadline 5 [REP5-243], ECC set out its concerns on the processing of TRO's which are summarised below for ease of reference: • At Para 2.4.2 of the outline Construction Traffic Management Plan (CTMP), the Applicant commits to use the existing Permit Scheme operated by Norfolk CC, Suffolk CC, Essex CC and Thurrock, in order to best coordinate the street works required for the Project. Use of the Permit Scheme is predicated on the availability of certain information and detail for the Council as Local Highway Authority, (LHA) to be able to assess the request. However, there is presently a lack of detail compared to what would normally be provided during standard TRO discussions as part of the Permit Scheme. This has made it difficult to fully engage on the acceptability of the TRO's through the examination process. To assist, ECC would refer to Appendix 1 of - its response to Examining Authority's Written Questions 1 (ExQ1) [REP3-078] and paragraph TT 1.38 for details normally requested by the County Council. • In ECC's Responses to ExQ1 Comments on the Applicant's draft itinerary for the ASI & comments on any further information or submissions received by Deadline 2) [REP3-077 and REP3-078], the information normally required to support any proposed TRO (that is to be subject to the standard ECC Permit Scheme process) are set out. • Without the required information, ECC respectfully suggests it would be difficult for the ExA to determine the impact and therefore, recommend the acceptability of the proposed TROs. ECC accepts the provisions of Article 12 of the draft DCO; and therefore recommends that the TROs within Schedule 13 should not be included if they are to form part of the Permit Process. • In relation to the final point in REP4-298 made by the Applicant on mirroring the TRO wording in the Bramford to Twinstead DCO, it should be noted that each application is considered on its own merits. Both Norwich to Tilbury and Bramford to Twinstead are very different projects in terms of scale and impact on highway users with Norwich to Tilbury affecting lots of areas of the county (including cumulative impacts in certain locations and varying road types). Through experience, ECC have become more aware of issues relating to NSIPs. It is not therefore considered unreasonable for ECC to learn from and adapt its response where previous actions or processes	The Applicant notes that TROs and road closures are not agreed with ECC and this is recorded in **5.9.3 Signed Statement of Common Ground - Essex County Council (ECC) (incl LLFA) [REP7-098]**. The Applicant's final position on this matter is set out in the Traffic and Transport Section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**. In response to the 5th bullet specifically, the Applicant is committed to the safe implementation of all TROs and to utilise the existing Permit Scheme process. As part of development of the scheme, the Applicant has prepared Stage 1 Road Safety Audits (RSA) for all highway accesses and mitigations, which include the use of TROs to provide safe and suitable arrangements for all road users. The designer responses were submitted to Essex in February 2026. The Applicant has not yet received feedback on these RSAs but welcome this as part of ongoing liaison.

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		do not serve Essex well and do not deliver the best outcomes for the County's residents. Consequently, if ECC is unable to agree the TROs through the examination process (due to lack of standard information being made available) then ECC's interests as highway authority will be severely compromised in terms of ensuring highway safety. On the basis of highway safety alone the DCO wording should be altered to allow for a full review of the TROs if they cannot be agreed with ECC during the Examination. Notwithstanding the above, discussions and review of TRO's will be required as part of the Permit Scheme as both parties will need to take account of road conditions and circumstances at the time of the works. As a result, there may need to flexibility in the response to ensure that the proposed TRO is safe and suitable for all highway users.	
REP7-553	Essex County Council	The following points review the wording of the DCO on the basis of the high level issues identified above. Note that ECC's terminology of TRO above relates to both Articles 16 and 49. There are two main points to consider in the drafting – TROs that are defined in Schedules 8 and 13 of the DCO and TROs that are not defined in the aforementioned schedules. *Temporary Closures and Diversions (Article 16)* Article 16(5) of the DCO provides that the undertaker must not temporarily close, alter or divert: • any street or public right of way specified under paragraph (4) without first • consulting the street authority; or • any other street or public right of way without obtaining the consent of the street authority, such consent not to be unreasonably withheld or delayed and subject to any reasonable conditions imposed by that authority. ECC's understanding is that temporary closures identified in Schedule 8 require consultation with the Highway Authority, whereas any closures not included within Schedule 8 require the Highway Authority's consent. Article 16(8) further provides that where consent is required under Article 16(5)(b), it will be deemed granted if the street authority does not notify the undertaker of its decision within 25 business days, or such other period as may be agreed between the parties. ECC has significant concerns regarding this provision. The 25-business-day period does not reflect the requirements of ECC's established Permit Scheme process, which includes the consideration of temporary road closures and associated Traffic Regulation Orders (TROs). The standard process requires up to 12 weeks to allow for statutory procedures, public consultation, consideration of representations, and technical assessment. As drafted, the DCO timescales are insufficient to enable these activities to be undertaken properly. ECC therefore considers that the implementation of any closure requiring consent should be subject to timescales agreed through the standard Permit Scheme process rather than relying on the default 25-business-day period. *Traffic Regulation Orders (Article 49)* Article 49 provides powers for the undertaker in relation to TROs, including: • powers to implement TROs identified in Schedule 13 (Article 49(1)); • a requirement to obtain the traffic authority's consent for TROs not included in Schedule 13 (Article 49(2)); • powers to implement permanent TROs identified in Schedule 13 (Article 49(3));	The Applicant confirms ECC's understanding relating to Article 16. All Streets listed in Schedule 8 require consultation with the relevant Highway Authority prior to implementing temporary closures. This would involve existing Permit Scheme processes as applied by **3.1 Draft DCO [Revision H]**. Article 16(5)(b) would only be required in the instance that changes to current construction plans result in the need for a temporary road closure on a Street not listed in Schedule 8. The Applicant does not anticipate that this would be needed frequently, however, it is necessary to ensure that the works can be constructed where unforeseen circumstances arise. The Applicant notes that TROs and road closures are not agreed with ECC and this is recorded in **5.9.3 Signed Statement of Common Ground - Essex County Council (ECC) (incl LLFA) [REP7-098]**. Article 49(8) is intended to ensure that the Applicant consults with the chief of police in relation to permanent traffic regulation measures. This is additional to the notification measures in Article 49(4)(a), which apply to both temporary and permanent traffic regulation measures.

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		• notification and advertisement requirements, including a minimum four-week notice period, for proposals under Articles 49(1)–(3) at (Article 49(4)); and • consultation with the chief officer of police and the traffic authority in relation to permanent TROs under Article 49(3) at (Article 49(8)). Article 49(10) provides that where consent is required under Article 49(2), it will be deemed granted if the traffic authority does not provide a decision within 25 business days, or such other period as agreed between the parties. ECC's interpretation is that temporary TROs, whether or not included in Schedule 13, are only subject to notification and advertisement requirements, while permanent TROs identified in Schedule 13 require consultation. ECC considers that Article 49(8) may contain a drafting error and should instead refer to Article 49(2), where the traffic authority's consent is required for TROs not included in Schedule 13. Notwithstanding this drafting point, ECC's principal concern remains the overall approach to TROs within the DCO. ECC considers that TROs should be submitted and assessed through the established Permit Scheme process rather than being dealt with solely through notification or consultation requirements set out in the Order. Under the Permit Scheme process, full details of the proposed TROs are provided for assessment alongside the associated works. This enables appropriate consideration of highway and traffic conditions at the time the works are proposed, informed public consultation, and a detailed technical review based on the information available at that stage. The process typically requires up to 12 weeks and runs alongside the permit application process. ECC therefore seeks an approach that aligns with its existing Permit Scheme requirements, including the established timescales for TRO assessment and approval. Given that the applicant has already accepted the Permit Scheme process and associated timescales, ECC does not consider that adopting the standard TRO process would result in additional programme delay, whilst providing greater certainty and ensuring that proposals are assessed on the basis of detailed and up-to-date information.	
REP7-553	Essex County Council	*Construction Management Plan (Rev E) [REP6-082]* The following points have not been included in the latest CTMP (Rev E) which ECC requested in its responses at Deadline 3 (REP3-078) to Inspector's Questions (TT 1.36) and in the comparison table provided at Deadline 5 (REP5-243) in Appendix 3A: *Paragraph 2.3.5* ECC require a commitment to undertake site observations on the PARs where there is school activity and agree outcomes with ECC prior to the use of the PARs; and any agreement following the site observations to be included in the Detailed CTMP. Further discussions are ongoing on this point, and the matter is considered within the SoCG. *Paragraph 6.6.2* The Applicant has committed to the Developer's Forum. However, we required high level principles to be included as follows: • The Developer's Forum would be a regular monthly online meeting beginning as soon as the DCO is granted. It would be chaired by ECC with key members of the other NSIP Teams invited as well as other Strategic Site Teams, alongside relevant members of the Local Highway Authority and Planning Authority	2.3.5 The Applicant's position is detailed in response to 3.11.21 in **5.9.3 Signed Statement of Common Ground - Essex County Council (ECC) (incl LLFA) [REP7-098]**. The Applicant is committed to continuing discussion with Essex County Council through the detailed design, with any required mitigation to be included within the final CTMP. 6.6.2 The Applicant updated Section 6.6.2 of **7.3 Outline Construction Traffic Management Plan [Revision G]** at Deadline 7 **[REP7-338]** to include additional information on the Developers Forum. • '*The Developer's Forum would be a regular monthly online meeting beginning as soon as the DCO is granted. It would be chaired by ECC with key members of the other NSIP Teams invited as well as other Strategic Site Teams, alongside relevant members of the Local Highway Authority and Planning Authority* • *The Forum would be attended by National Grid as scheme promoter alongside their Main Works Contractor(s) constructing the scheme* • *At critical times where programmes overlap National Grid and the Main Works Contractor(s) may be required to attend more regular weekly or bi-weekly meetings for*

- Funding will be provided for the time spent by ECC in organising and chairing the meetings over the life of the construction period of
- The Forum would be attended by National Grid as scheme promoter alongside their Main Contractor(s) constructing the scheme
- At critical times where programmes overlap National Grid and the Main Contractor(s) will attend more regular weekly or bi-weekly meetings for urgent discussions on collaboration Norwich to Tilbury capped at £45,360 (based on monthly meetings) with any additional meetings charged at £105 per person
- Commitment to provide flexibility to adapt to changing conditions as identified during the Developers Forum

ECC comments on the Applicants current position in respect of the Developers Forum are set out in the submitted SoCG in Appendix A at ID 13.

Paragraph 5.2.2

ECC requests extra text to be included to require the review of structures on the PARs and diversion routes in addition to the AIL / HGV routes, to ensure all routes are still appropriate for the intensification of use proposed during the construction phase. It is anticipated the focus would be on the rural network.

ECC acknowledge that highway structures have been checked for the AIL routes proposed but ECC also require checks for the standard routes as there may be weak bridges that are being monitored or braced that the Applicant is not aware of.

ECC acknowledge that highway structures have been checked for the AIL routes proposed but ECC also require checks for the standard routes as there may be weak bridges that are being monitored or braced that the Applicant is not aware of.

Further discussions are ongoing on this point, and the matter is considered within the SoCG.

Paragraph 5.4.20

ECC require the information should be provided every three months at all times to the LHA and a discussion undertaken to agree whether there is a material impact and if so what corrective action should be taken (rather than National Grid's EnvCoW determining whether there is a material effect and discussing with the LHA). Further discussions are ongoing on this point, and the matter is considered within the SoCG

Paragraph 5.4.11

ECC requested that the wording "or other external factors" be included as this would cover things like emergency works that would not be covered by planned works. ECC also requested that a final sentence is included as follows: "In this way, the Contractor is providing a flexible approach to respond to changes in conditions." It is felt this last sentence provides context and shows there needs to be a flexible approach when needed.

Section 2.3

ECC required a commitment that staff will be unable to access the on site parking areas during specified hours to prevent arrivals/departures during peak hours. Discussions through the SoCG include monitoring / mitigation to control arrivals / departures during the peak hours which may require updating of this section.

Section 5.4

In this section, ECC requested wording to effectively take baseline conditions and monitor areas along or within close proximity to the PARs, to determine any potential

urgent discussions on collaboration I National Grid and the Main Works Contractor(s) will seek to respond flexibly to changing conditions identified through the Developer's Forum, subject to compliance with the DCO and National Grid's contractual and Transmission Licence Obligations'

As noted in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**, the Applicant is discussing with ECC the recovery of ECC's appropriate costs, such as the Developer's Forum costs, through a Planning Performance Agreement (PPA).

5.2.2

Section 5.2.2 of **7.3 Outline Construction Traffic Management Plan [Revision G]** includes a commitment that "*The Applicant will undertake targeted condition surveys on PARs on a quarterly basis during construction, where the scope of surveys will be agreed with the LHA in advance*". The Applicant has additionally committed to undertaking "a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues. It is anticipated that the rural routes will be the focus of the drive through survey's". The Applicant will continue to discuss the detail of these surveys with Essex County Council through detailed design development.

5.4.20

The Applicant updated Section 5.4.21 of **7.3 Outline Construction Traffic Management Plan [Revision G]** at Deadline 7 **[REP7-338]** to include:

'*Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents, the EnvCoW and Transport Coordinators will notify National Grid and the relevant local highway authority, and where appropriate National Highways*.'

The Applicant considers this addition to **7.3 Outline Construction Traffic Management Plan [Revision G]** suitable to remove Essex County Council's concerns.

5.4.11

The Applicant provided a response to this query in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114**] where the flexible approach is inherent per Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision G]**, and the text was omitted as a result.

Section 2.3

The Applicant provided a response to this query in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**. The Applicant considers the reporting and monitoring of staff arrivals and departures in **7.3 Outline Construction Traffic Management Plan Appendix B – Outline Construction Worker Tavel Plan [REP7-340]** sufficient to monitor the arrival and departure times of staff, which will be reported to Essex County Council in the quarterly report to remove the concerns.

Section 5.4

The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision G]** at Deadline 8 to include additional wording within the driver information pack:

Examination Library ID	Name	Matter	Applicant Comment
		HGV parking issues and agreed mitigation. Further discussions are ongoing on this point and the matter is considered within the SoCG. *Paragraph 5.5.5* ECC requested wording be inserted after paragraph 5.5.5 to the effect that access design approvals should include details of car parking supply and demand for compounds along with cycle parking. In addition, text should be included on what solutions will be implemented if overspill parking occurs. Further discussions are ongoing on this point, and the matter is considered within the SoCG. *Paragraph 5.8.5* ECC need more surety that any impact on the access to the Depot (including on the wider network affected by the works) will be minimised. The wording in this paragraph needs to emphasise the importance that delays must be minimised to reduce impacts on ECC's response to emergency incidents. Road closures and traffic management measures therefore need to be discussed and agreed with ECC to minimise impacts (rather than just "notified"). As it stands, the TROs in schedules of the DCO are not agreed and are notifiable (Schedule 13) only (on the basis of the current DCO wording). Therefore, there would be no way of influencing the TROs unless the DCO wording were updated) hence ECC requirement for there to be engagement/agreement on this point for the Depot. *Table 6.1* The table should be updated to include monitoring of construction workers in terms of arrival/departure times. Further discussions are ongoing on this point, and the matter is considered within the SoCG. *Paragraph 6.3.4* ECC recommends examples of corrective actions (sanctions) should be included in the outline CTMP as a starting point for discussions with the Contractor rather than, suggesting the actions are agreed subsequently with the Contractor through the Detailed CTMP as currently proposed . Examples given previously in ECC's post hearing submissions to ISH2 [REP4 328], Appendix F, reference P55) were: • extending the programme of works to reduce the impact of traffic; • warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site; and further disciplinary actions as necessary for repeated incidents • closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or • implementing additional shuttle buses to reduce worker traffic. Further discussions are ongoing on this point, and the matter is considered within the SoCG. *Section 6.4.1* The list of non-compliance should include workers arrivals/departures times during peak hours. Further discussions are ongoing on this point, and the matter is considered within the SoCG.	'*that the driver information pack will identify appropriate lorry parks, services and designated overnight parking locations; include information in general on inappropriate locations for waiting or parking; and identify specific locations along or adjacent to a PAR where it would not be appropriate to wait or park. The drive through surveys of the PARs will be used to identify these locations. The Main Works Contractor(s) will monitor HGVs that it owns and operates to check for parking in inappropriate specific locations along or adjacent to a PAR and take corrective action in line with the non-compliance procedure detailed in Section 6.3 of Outline CTMP*.' The Applicant considers this addition suitable to address Essex County Councils concerns. 5.5.5 The Applicant provided a response in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** with the level of provision refined during the detailed design phase. Relating to overspill parking, the monitoring of non-compliance is the reasonable and practicable option, with enforcement set out in Section 6.4 of **7.3 Outline Construction Traffic Management Plan [Revision G]**. 5.8.5 The Applicant has committed to develop and agree measures to ensure access to Ardleigh Depot with Essex County Council before carrying out any works, within section 5.8.5 of **7.3 Outline Construction Traffic Management Plan [Revision G]**, addressing Essex County Councils concerns. The Applicant feels this commitment is acceptable. Table 6.1 The Applicant has included details of monitoring of construction workers arrival and departure times within the quarterly report detailed in **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP7-340]**. These will be provided to Essex County Council. Section 8.2.6 details that any changes in staff arrival and departure times related to seasonable variations will be reported, providing a record of arrival and departure times across the year. 6.3.4 The Applicant updated Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision G]** at Deadline 6 **[REP6-082]** include more information on the enforcement process. The Applicant has stated that additional sanctions will be included in the final CTMP. • Extending the programme of works: The Applicant's position is that extending the construction programme is not appropriate as it would delay delivery of a Critical National Priority project that NESO has identified as essential to achieving Clean Power 2030. Delays beyond 2030 would postpone the connection of nationally significant offshore wind generation, prolong transmission constraints on the electricity network and undermine delivery of Clean Power 2030. NESO estimates that a one-year delay in energisation would expose consumers to more than £2.5 billion in additional constraint costs. Extending the programme would also prolong the duration of construction effects on local communities and increase the risk of further delays to the delivery of the Project's national benefits. • Warnings given to drivers: The additional steps in the enforcement process detail that communication would involve the contractors at each stage, where they may provide direct warnings to drivers. Additional clarity is expected to be provided in the final CTMP. • Closure of Parking: The Applicant has provided a response on the option to prevent staff arriving / departing during peak hours on the local highway network in **8.4.16**

Examination Library ID	Name	Matter	Applicant Comment
			Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]. • Shuttle bus to reduce worker travel: The Applicant provided a response to this query in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]. Essex County Council will have the opportunity to feed into this matter further during detailed design and as part of the approval for the final CTMP, to be produced by the Main Works Contractor(s). 6.4.1 The Applicants position is detailed in 3.11.60 in **5.9.3 Signed Statement of Common Ground - Essex County Council (ECC) (incl LLFA) [REP7-098]**. As noted above, the monitoring of worker arrival and departure times is captured in **7.3 Outline Construction Traffic Management Plan [Revision G]** and will be reported within the quarterly report.
REP7-553	Essex County Council	*Archaeology* A number of new or revised reports have been submitted at Deadline 6 which are relevant to the Historic Environment and archaeology. Draft DCO (3.1 Draft DCO (Tracked) (Final Issue F) [REP6-031] Archaeology is included in Requirement 5(1)-(7) Only minor amendments have been made to Requirement 5 at Deadline 6. It is acknowledged that the Applicant has previously incorporated some of the changes requested by ECC within the re-wording of the requirements. While there is no objection to the content of the DCO for Requirement 5, it is recommended that the wording provided by Suffolk County Council Archaeological Services for Hearing ISH4 be adopted. This would result in more concise wording, fewer subsections and ensure greater clarity for the discharge of conditions. The proposed wording is set out in Table 1 of SCC's submission [REP6-167] which ECC supports.	The Applicant notes Essex County Council's comments on the drafting of Requirement 5. The Applicant set out its responses to Suffolk County Council's suggested drafting in its **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP7-482]** and does not propose further amendments to Requirement 5 in **3.1 Draft DCO [Revision H].**
REP7-553	Essex County Council	*6.11 Environmental Statement Chapter 11- Historic Environment (Tracked) (Final Issue C) [REP6-060]* The Environmental Statement (ES) has been updated following further fieldwork results. Geophysical survey for the Priority areas is now reported as complete, and c.80% of Phase 2 geophysical survey has been undertaken and are contained in Appendix 11.8: Geophysical Survey (Phase 2) Report [REP6-065]. The level of fieldwork completed for the Priority Areas along the route, which are identified due to potentially having greater constraints, is now considered acceptable for decision making. There is agreement with the conclusions of the ES for archaeological remains that have been identified through the Historic Environment Record, geophysical survey and trial trench evaluation and listed in ES Appendix 2 [REP6-064].The following reports have all been updated to reflect further fieldwork results: [The IP lists a number of ES documents that have been updated]. There are no comments on these reports.	The Applicant notes the respondent's comment.
REP7-553	Essex County Council	*Outline Archaeological Mitigation Strategy/Outline Written Scheme of Investigation (OAMS/OWSI)* A revised version of the outline archaeological mitigation strategy and outline written scheme of investigation (OAMS/OWSI) was provided at Deadline 5 (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Tracked)(Final issue B) [REP5-161].	The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (OAMS/OWSI) has been updated in response to the comments from Essex County Council and was submitted at Deadline 7 (see **[REP7-352]**). The **-7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]** has been submitted at Deadline 8**.**

Examination Library ID	Name	Matter	Applicant Comment
		A small number of outstanding issues had not been resolved in the revised version which relate to the geoarchaeological investigations, the trial trench proposals and proposed mitigation and this is reflected in the Statement of Common Ground. The sections on Geoarchaeological deposit modelling and Geoarchaeological and Palaeoenvironmental Investigation have been revised in line with our recommendations and are now considered approved. This has been reflected in the updating of 3.7.25 in ECC's Statement of Common Ground which is now Agreed. The principles and scope of the Phase 2 trial trench evaluation methodology have been agreed previously in discussion with the archaeological consultants. The location of the proposed trenches has been provided directly as digital data and is currently under review. The results of the review will be reported back to the archaeological consultant directly. The proposals for mitigation will be confirmed post consent following discussions with the applicant's archaeological advisors. It is noted the revised OAMS/OWSI will need to be submitted at Deadline 8 for formal approval.	
REP7-554	Essex Police	I write in support of the submission of the Statement of Common Ground (SoCG) between Essex Police and National Grid relating to the Norwich to Tilbury Project. This document is supplementary to the SoCG and serves to invite the Examining Authority (ExA) to note that irrespective of progress, important matters relating to operational resilience, operational independence and long-term funding arrangements remain subject to ongoing discussion that will likely continue post-examination. The SoCG reflects significant engagement that has taken place throughout the Examination process, recording numerous areas of agreement between the parties. Essex Police remain committed to working collaboratively to resolve the outstanding issues. We also welcome National Grid's recognition that the project will not result in any publicly funded costs associated with non-core policing activities – including in relation to escorts of Abnormal Indivisible Loads. This is a well-established principle whenever special policing services are required and is clearly captured in the NPCC Guidance. As a summary, Essex Police note that the following critical issues remain subject to further negotiation and agreement, and Essex Police shall apply the following core principles in its post-examination cooperation with National Grid: • The Chief Constable of Essex Police retains direction and control of Essex Police officers and staff with operational independence to determine how to deploy resources and respond to incidents – including with regard to managing the safety of AIL escort activity (and other project-related policing requirements). • The provision of police services for the project (to include but not limited to escorting AILs) amount to special police services (s25 Police Act 1996) and the NPCC guidance on police charges will be the benchmark for determining the costing of police resources to escort AILs, as well as the relevant Essex Police/Police Fire and Crime Commissioner for Essex rules and requirements, including the costs of establishing, maintaining and ultimately disbanding any dedicated capability required to support the Project. The AIL Funding Sum shall be index linked on an annual basis by the greater of CPI or the blended annual increase in the NPCC charging rates. Having regard to the above principles, the following matters require clear resolution:	The Applicant welcomes this submission by Essex Police and notes the significant engagement that has taken place throughout the Examination process. The Applicant will continue to work closely with Essex Police and Suffolk Constabulary after the close of the Examination to address any outstanding concerns.

Examination Library ID	Name	Matter	Applicant Comment
		• The entering into of a side agreement that secures funding arrangements which are capable of being reviewed and adjusted where there are changes to project duration, programme delivery, route selection, operational assumptions, construction methodologies or the volume of AIL movements. • A formal change-control process capable of managing evolving operational requirements throughout the life of the Project. • Explicit recognition that any increase in policing demand resulting from operational planning, protest activity, public safety considerations, incident management, route amendments or other project related impacts should be recoverable from National Grid. These matters are not raised as objections to the Project itself but rather as prudent safeguards necessary to ensure that policing services for the communities of Essex are not adversely affected by the implementation of a nationally significant infrastructure project. We are encouraged by the progress made during the Examination and believe there remains a clear pathway towards agreement.	
REP7-555	Field Fisher on behalf of British Pipeline Agency Limited	Fieldfisher LLP ("Fieldfisher") continue to act for the British Pipeline Agency Limited ("BPA") as agents for United Kingdom Oil Pipelines Limited ("UKOP"). We write further to the representations and submissions made on behalf of BPA / UKOP to date including RR-0413, PDA-011, AS-086, REP1-235 – 238 (inclusive), REP3-121 and the oral submissions made by Fieldfisher on behalf of BPA / UKOP at CAH1. The Applicant and UKOP have now executed and completed a private side agreement in relation to the Pipeline. BPA / UKOP therefore hereby withdraw any objection to the Application made by or on behalf of UIKOP prior to the date hereof, in full and with immediate effect.	The Applicant welcomes the withdrawal of BPA's objection.
REP7-582	Flora Leone	Throughout the successive stages of this process, it is my view that the Applicant has often failed to provide accurate, fully transparent, and well-evidenced information regarding both asset valuations and the comprehensive cost comparisons between the proposed overhead scheme and its viable alternatives. Of significant concern is that communication with directly affected parties and the wider public, at both local and national levels, has been characterised by inconsistent and poorly documented data. In particular, it is a matter of concern that the promotional economic assertions presented to the wider public do not fully align with the specific technical evidence currently undergoing scrutiny by the Examining Authority.	The Applicant does not agree that it has failed to provide accurate, transparent or evidence-based information regarding asset valuations or the assessment of reasonable alternatives. The approach to option appraisal, including the consideration of alternative technologies and routeing solutions, has been set out in the application documents and has been subject to detailed examination throughout the Examination process. Information relating to costs, engineering, environmental effects and deliverability has been provided in the relevant application and Examination submissions and has been updated or clarified where appropriate in response to requests from the Examining Authority and Interested Parties.
REP7-582	Flora Leone	1. Underestimation of Heritage Impacts: The Vale (Non-Designated Heritage Asset) The Evidence: I am a resident of The Vale, [redacted text]. In the Environmental Statement, the Applicant has downplayed this Non-Designated Heritage Asset (NDHA) by categorizing its baseline value as "low," assigning a pre-mitigation magnitude of impact as "low adverse," and predicting a permanent "negligible adverse" significance of effect. • The Conflict with Local Planning Policy: This assessment directly contradicts the formal findings of South Norfolk Council, which has highlighted the building's regional architectural and historical value. The asset features a rare Victorian social welfare double-cruciform plan—one of only two such examples remaining intact across the United Kingdom. Planning Relevance under NPS EN-1: Introducing close-range overhead lines and heavy lattice pylons into the immediate vicinity would severely erode the building's rural,	As a low value Non-Designated Heritage Asset (NDHA), the setting of the Former Henstead Union Workhouse and Vale Hospital, Swainsthorpe (HER ID - MNF9770, Project ID - 1312) has not been considered in accordance with the agreed assessment methodology (see **6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [REP7-240]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242]**). It is the archaeological potential of the asset that has been assessed for the construction phase, which has resulted in the partially quoted conclusion, which in full reads: '*The value of asset (1312) is low, and the magnitude of impact prior to mitigation is considered to be low adverse. The implementation of the archaeological mitigation would reduce the impact to negligible, resulting in a direct, permanent negligible adverse significance of effect (not significant).'* The Applicant is confident that the assessment of asset (1312) has been undertaken in accordance with the agreed methodology noted above and that the assessment is

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		open setting and physical character. This represents a meaningful, permanent reduction in its overall heritage significance, which has not been adequately recognized by the Applicant.	appropriate and proportionate within the DCO framework. The Applicant and South Norfolk District Council have reached a consensus with regard to the methodology and the identification of heritage receptors, and this is recorded in **5.9.5 Signed Statement of Common Ground – South Norfolk District Council [REP7-102]**.
REP7-582	Flora Leone	2. Deficiencies in Local Consultation and Unresolved Community Impacts at The Vale The Evidence: On 12 June 2026, agents from UK Power Networks visited our site alongside our land agent and a small group of residents. This followed three separate prior consultations: an initial on-site discussion with UK Power Networks (February 2024), an online follow-up meeting, and a subsequent meeting with Fisher German (July 2025). These discussions initially centred on proposals to excavate our rear car park and subsequently our sole access driveway to reroute a lower-power line before the primary proposed lattice pylons are constructed outside our perimeter. The Unresolved Risks: Residents have consistently presented safer, less disruptive alternatives at every juncture. Severing or destroying our single access driveway risks isolating 36 households, [redacted text] . Furthermore, due to an absence of accurate underground pipe schematics, excavation introduces a substantial risk of catastrophic utility damage. Despite receiving prior assurances that these concerns would be escalated to National Grid and resolved, the Applicant re-submitted an identical, unaltered proposal prior to the June 2026 meeting. No further updates have been provided since. Cumulative Construction Harms: When combined with the intention to utilize the adjacent field on the opposite side of The Vale for storage and offices, as well as works for pylons assembly, residents face being hemmed in from all angles by heavy civil works. This introduces prolonged exposure to noise, air pollution, heavy load construction traffic, and local road closures, fundamentally disrupting the local countryside and wildlife. Residents here, as in other parts of the region along the pylon route, are therefore asked to bear a deeply disproportionate cost—facing severe financial loss (devaluation of their properties), the destruction of countryside and wildlife, and years of major disruption for a nationwide strategy.	The Applicant does not agree that these concerns have been ignored. A meeting was held between Fisher German and several residents of The Vale in July 2025 as part of the targeted consultation and engagement undertaken in relation to the Project. During that engagement, concerns regarding the proposed UKPN works, including potential impacts on access, were discussed in detail. The feedback received was formally recorded and submitted to the Applicant through a number of External Design Change Request Forms for consideration as part of the design development process. This included a request to reroute the proposed UKPN connection away from the main access drive and further west through adjacent arable land in order to reduce potential disruption to residents' access arrangements. Further correspondence and plan reviews were subsequently undertaken between Fisher German and affected parties during July and August 2025. The Applicant notes that UKPN has continued engagement with affected parties regarding its proposed works, and consideration of design development and mitigation measures has progressed in parallel with that engagement.
REP7-582	Flora Leone	3. Contradictory Marketing Initiatives and Community Fund Distributions The Evidence: Many residents along the proposed pylon route have recently received marketing cards from the Applicant seeking feedback on how to allocate an anticipated "Community Fund" exceeding £30 million, contingent upon the project receiving development consent. This material highlights opportunities to support green spaces, community areas, and physical health and well-being. The Policy Paradox: While local communities acknowledge the standard nature of community benefit funds, the distribution of promotional literature emphasizing the preservation of health, well-being, and green space stands in direct opposition to the physical reality of the scheme, which involves the widespread modification and industrialisation of the local countryside. This reliance on generic marketing materials masks the devastation their proposal will cause, and cannot substitute for a rigorous, site-specific minimization of localized devastation to interested parties.	In line with government guidance, the Applicant is developing plans for a Community Fund which would become available if the Project receives development consent and construction begins. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order. The Community Fund is intended to ensure that communities which host new electricity infrastructure will receive meaningful and long-lasting benefits. The Applicant launched its consultation on the Community Fund for the Project on 7 July. This included sending a postcard to properties along the route of the Project which listed some areas which the Community Fund could support. These themes were taken from previous engagement and feedback and will be developed further through consultation. The Applicant intends the Community Fund to reflect local needs and priorities, and these themes were provided as a starting point for suggestions.
REP7-582	Flora Leone	4. Financial Risk and Procedural Prejudging via Advance "Enabling Works" Applications The Evidence: The Norwich to Tilbury project has been consistently presented to the public by NG as the most cost-effective and economically prudent pathway to achieving Net Zero targets. However, the Applicant's mid-June 2026 communications to local councils and landowners reveal a parallel strategy: submitting advance town and	To support the phasing of construction, the Applicant is in discussion about submitting separate planning applications to local planning authorities for some small, localised enabling works. This is a normal approach for many major infrastructure projects. Where these applications proceed, plans will be included to reinstate any work we carry out if the DCO is not granted. The Applicant previously consulted on these works while we

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		country planning applications for "enabling works"—including construction compounds and haul roads—prior to the main Development Consent Order (DCO) receiving final approval. Procedural and Economic Implications: This approach introduces two critical concerns for the examination process: 1. Procedural Fairness: Constructing or applying for heavy infrastructure prematurely risks creating an artificial impression that the final DCO approval is a fait accompli, thereby confusing local communities and subtly undermining the regulatory integrity of the Planning Inspectorate's ongoing examination. 2. Prudent Use of Consumer Funds: This strategy forces electricity bill payers to underwrite highly speculative infrastructure. Should the main project ultimately be modified or rejected by the Secretary of State, consumers would bear an unjustifiable financial burden: first to construct unnecessary access routes, and second to fund the subsequent landscape restoration and reversal works.	developed our proposals for the Norwich to Tilbury project. No new or additional works are proposed beyond those set out in the DCO application. The Applicant expects to submit any applications that are taken forward in August. Once submitted, the local planning authorities will undertake consultations on the Applicant's plans.
REP7-582	Flora Leone	5. Parallel Media Campaigns during Active Examination and Trustworthiness of Information under NPS EN-5 (Section 2.11) The Evidence: The formal public consultation phase has closed, and this project is under active examination. Despite this, the Applicant recently launched a high-profile, sponsored national newspaper campaign (The Sun and The Times July 1st 2026) which seems to be designed to still shape public perception during the active examination phase of the Norwich to Tilbury project. • Infringement of Consultation Balance: Disseminating a highly selective corporate narrative outside the formal examination framework creates an unaccountable "dual narrative" that inadvertently bypasses the rigorous, evidence-led scrutiny of the Planning Inspectorate. This is exemplified by public relations materials that promote pylons as an aesthetically appealing choice, trivializing their impact by noting they have been part of the landscape for nearly 100 years, highlighting different "styles", and referencing a "Pylons Appreciation Society". This represents blatant, non-objective advertising for a preferred overhead route over less intrusive, less devastating underground or offshore alternatives. Non-Compliance with Cost Transparency (NPS EN-5 Section 2.11): The national promotional texts weaponise a baseline "4.5 times more expensive" multiplier to summarily dismiss undergrounding options along the 180km corridor, without providing a transparent, itemised calculation within those public spheres. Under NPS EN-5 (Section 2.11), any evaluation of alternative grid options must be based on a comprehensive assessment of whole-life costs—including upfront capital expenditure, long-term operational costs, maintenance cycles, lifetime cost savings achieved by reducing energy loss during transmission. By presenting un-itemised capital costs in its public relations, the Applicant fails to provide the objective transparency required for a legitimate examination. Conclusion In light of the policy requirements of NPS EN-1 and NPS EN-5, I respectfully ask that the Examining Authority require the Applicant to reconcile the discrepancies between their public PR claims and the formal evidence base. In particular, the Applicant should be compelled to provide a fully itemised, life-cycle economic breakdown of alternative routing and undergrounding costs to justify their public "4.5x" headline figure	The Applicant notes the respondent's comments. The Applicant disagrees that any public relations or media engagement undertaken by the wider business has any bearing on the examination of the Project or its Need Case. Throughout the development of the Project and during the Examination, the Applicant has provided extensive consultation, technical and environmental information to explain the Project, the need case, the alternatives considered, and the reasons underpinning the decisions taken. While stakeholders may disagree with some of those decisions or the conclusions reached, the Applicant's objective has consistently been to provide sufficient information to enable informed participation in the process and to engage constructively with the issues raised.

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REP7-556	Fordham Parish Council	I write in response to NG's "EN020027-003527-7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation Revision B Clean Version" document. While nobody wants pylons, I am pleased to see that pylon numbers 48 and 47 have been moved to avoid our Roman dig site (black hatched area), though I suspect this a commercial, not altruistic decision! However, they don't show whether the cable pulling station that was planned to sit on it has been moved or not as it is not shown on their latest plan. I would like to see this made available. In their document they claim to have completed geophysical surveys over and around our dig site, I would like to know when this was done as we work on the site three days a week, all year round and saw nobody, they also say that "nothing of note" was found, our own geophysical surveys can thoroughly contradict that. I would very much like to see copies of their geophysical surveys. Anyway, they have not surveyed the entire area they claim. See attached plan for reference. The green hatched area is where they say has been surveyed and it covers about two of the three acres of our fenced dig site, this would be impossible to survey as it is full of trenches, pits and spoil heaps, not to mention mostly covered in deep vegetation. I speak as someone that has done a great deal of geophysical work. They also show that about four acres of Woodland has been surveyed, around pylon 46 (also black hatched), to the north east of our dig. It would be impossible to survey the dense scrub and woodland that exists there. Now that pylons 47 & 48 have been moved, this allows pylon 46 to be moved across Fossetts lane, thus avoiding the destruction of the woodland. Having looked at all the plans in their document that shows all the pylons, various stations and multiple underground works, I cannot believe that NG's current plan is more practical, less disruptive, less destructive and cheaper than the offshore option.	Pulling locations are presented alongside other design details on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**. The location in question is on page 39 and shows the pulling location clipped around the constraint of the dig site. The movement of pylon TB46 to the other side of the road would result in the pylon being at least 50m closer to its nearest property and require at a combined height increase of 9m on pylons TB46 and TB47. For the overhead line to avoid impacting the woodland, an additional angle would need to be added, and get even closer to the nearest property – both options would be in contradiction with the Holford Rules. With regard to the historic environment, the Applicant identified the archaeological potential of the Project at the location of pylons TB47 and TB48 at an early stage of the assessment and the Project design was changed at this location prior to submission of the DCO application to minimise any potential impacts on below ground archaeological remains. Due to the early identification of the archaeological potential in this area, the Project's Order Limits between pylons TB46 and TB48 were identified as a priority geophysical survey area in 2023. The geophysical survey of the Priority areas, where access was gained and ground conditions were conducive, took place between 08/01/2024 and 28/11/25 and the results of the fieldwork in this location have been available on the Planning Inspectorate website since submission of the DCO application (**6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212]**, illustration 82-83). As noted above, the pulling location for pylon TB46 has been reduced to avoid the excavation area, and it should be noted that construction activities within the pulling location would not result in below ground impacts.
REP7-558	Innova Renewables Limited	Innova Renewables Limited (Innova) provides this update following further discussions with National Grid (NG) regarding the interfaces between its Parkgate and Hall Farm projects and the proposed N-T line. *Parkgate* Innova has signed a SoCG with NG which we understand NG will submit at DL7. We note there a number of points included in the SoCG which are contingent on a legal agreement being completed. Innova has discussed the draft Heads of Terms with NG to progress an agreement albeit these discussions are at a very early stage and we need to understand and agree the main points of principle first. Until an agreement is in place, Innova maintains its objection to the N-T proposal on the terms set out in its previous representations. Innova will provide closing submissions for the benefit of the Examination at Deadline 8 to provide any further update regarding the progress of the legal agreement. Innova highlights the following points which are agreed as part of the Parkgate SoCG: 1. NG has committed to Innova that it will move its pylon (and its associated construction compound) entirely out of the Parkgate solar area. NG has also agreed that it will not prevent Innova from installing solar panels under the new N-T overhead lines and that there is sufficient minimum height clearance. As noted, these matters will be confirmed in a binding legal agreement. This agreement will also focus on management of future construction interfaces albeit we expect interfaces will be the N-T proposal interacting with a built out solar farm as it is expected to be an operational asset in short order.	The Applicant notes Innova's update and welcomes the progress reflected in **8.3.18 Signed Statement of Common Ground – Innova Renewables (Parkgate Solar Farm) [REP7-409]** submitted at Deadline 7. The Applicant remains committed to working constructively with Innova to progress the legal agreement and resolve remaining matters. Discussions are ongoing and many of the outstanding matters are commercial in nature. In response to the specific points raised: 1. Pylon relocation and clearances – the Applicant confirms that the relevant pylon has been relocated outside the Parkgate solar development area. The Applicant also notes that while suitable electrical clearances can be achieved, consideration must be given to the specific plant, equipment and maintenance activities that Innova intends to undertake beneath the overhead line. 2. Heads of Terms for the legal interface agreement - the Applicant provided comments on Innova's amendments to the draft Heads of Terms on 30 July 2026. A further meeting is diarised w/c 3 August 2026. 3. Ongoing discussions - Regular meetings are taking place between the parties to discuss both the legal agreement and the associated technical interface matters. 4. Land rights - the Applicant is continuing its engagement regarding the land rights required for the Project and has engaged with the freeholder to date. This is consistent with the strategy outlined in Section 3 of **4.4 Land Rights Tracker [Revision H]** (see paragraph 3.1.7 particularly). Discussions will continue as the parties work towards agreeing a preferred option for the voluntary grant of land rights to the Applicant.

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		2. Innova has received and provided comments on a first draft set of Heads of Terms and we await feedback from NG on our comments as well as further discussion on the same. 3. Innova and NG have agreed to have weekly calls to discuss the Heads of Terms; albeit they have not started as yet (save for an initial call to discuss the approach). 4. Innova still has not had any discussions with or correspondence from NG regarding the land rights it needs over the Parkgate solar farm. Innova has raised concerns regarding this issue previously and encourages NG again to seek these matters voluntarily and by agreement with both the landowner and the project SPV. Innova envisages the legal agreement covering this issue. 5. We do not have an agreed timeline to finalise the legal agreement but we will keep the ExA updated on progress (included post-Examination). Innova has flagged compatibility issues previously to NG and the Examination. We are aware of the proposed Article 10 in the DCO which seeks to deal with this issue. Given Innova's position that NG should avoid creating a situation where there is inconsistency between its consented development and the terms of the DCO/works to be carried out, Innova does not consider this article is necessary or reasonable in the circumstances and it creates ambiguity. Innova notes the SoS's findings in the Mona DCO Decision Letter which provides "Deletion of (previously) Article 47 (Inconsistent planning permissions) because it is not considered necessary and creates potential ambiguity." Innova's expectations are that NG will ensure that at all times the Parkgate project remains compliant with all its obligations under the planning permission, the grid offer, land rights it has in place, as well as all other material contracts such as its CfD obligations. Where there is interference/ temporary disruption to the Parkgate project, Innova expects that it is incumbent on NG to either remedy or seek special dispensation on the project's behalf with the various counterparties (i.e. LPA, DNO, LCCC, the landowner etc.)	5. Programme for agreement - Whilst the Applicant is not in a position to commit to sign as yet undefined legal agreements by a specific date, the principal outstanding matters are commercial in nature and anticipates that a number of these can be resolved through the established principles of the Compensation Code. With regard to Article 10 of **3.1 Draft DCO [Revision H],** the Applicant maintains that the provision is necessary and appropriate. Unlike the Mona Offshore Wind Farm Order 2025, the Project is an onshore linear scheme, and so interactions with other planning permissions and development consent orders is inevitable. Article 10 is designed to ensure that neither Innova nor the Applicant find themselves in a position whereby the lawful development of their projects under their respective consents renders the other incapable of implementation. It also seeks to protect the developers from enforcement action where their developments are carried out lawfully in accordance with their consents. The Applicant does not agree that it creates ambiguity, in fact, the Applicant considers that it makes the position clear. A very similar provision was included in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. Amongst other things, the article addresses situations where authorised works temporarily interact with an existing consented development. The Applicant will remove all temporary works and restore the land to the reasonable satisfaction of the owners of the land in accordance with the provisions of **3.1 Draft DCO [Revision H]**. Any affected elements will be reinstated so that the development is returned to substantially the same position as existed prior to the works. The Applicant notes that, in the case of Parkgate, there is likely to be a temporary interface between Parkgate elements like planting and a fenceline and construction activities, including the proposed haul road. The Applicant remains willing to better understand any specific concerns that Innova considers may arise in relation to its planning permission, grid connection arrangements, land rights or contractual commitments. However, no evidence has been provided to date demonstrating that the Project would create the issues identified or require the intervention with third parties suggested by Innova.
REP7-558	Innova Renewables Limited	*Hall Farm* Innova has provided final comments on the SoCG to National Grid and we expect a signed version will be submitted to the ExA before the close of the Examination. This confirms a number of agreed matters but also highlights matters which are still under discussion and need to be resolved. This ongoing engagement will continue through the negotiation of an interface agreement between Innova and NG. On this point, Innova has received a draft set of Heads of Terms from NG for a side agreement. Innova has provided comments on these to NG and has suggested ongoing calls to ensure momentum is maintained in order to progress the agreement. Until this is document agreed, Innova maintains its objection to the N-T proposal on the basis of its previous representations made. Innova would like to note the following: 1. Innova is pleased to see that NG has confirmed that it will remove all rights of compulsory acquisition that it has sought to date over the Eastern Swathe (as defined in previous representations). NG has confirmed in the SoCG that it will reduce these rights to Class 8 rights within the Book Reference and Land Plans. Innova awaits the updates to these documents and the DCO before it removes its objection regarding this area of land. Innova expects the limits of deviation on the Works Plans will also be amended to reflect this change.	The Applicant has returned the SoCG to Innova seeking final approval of contents and a signed version is included the Deadline 8 submission. Heads of Terms negotiations are progressing with the respondent as noted by Innova. 1. The Applicant has formalised the Class 8 status of the area of land in question at Deadline 7 and understands this specific concern is now fully addressed as a result. 2. The Applicant agrees to seek to secure an interface agreement between both parties, Heads of Terms currently under discussion are a precursor to this agreement. Design amendments have been proposed by both parties in an effort to address the interface between the Innova attenuation basin and pylon RG4, good progress is being made however this point remains under further investigation. 3. The Applicant has amended its position and notes Innova's statutory undertaker position, this is reflected in the Deadline 7 submission documents and S127 form. 4. The respondent's position is noted, the Applicant is in discussions with Innova to agree a legal agreement. The Applicant's direct engagement and negotiation for the acquisition of land or land rights is focused on the interest holder capable of granting the rights required for the Project. The Applicant is continuing its engagement regarding the land rights required for the Project and has engaged with the freeholder to date. This is consistent with the strategy outlined in Section 3 of **4.4 Land Rights Tracker [Revision H]** (see paragraph 3.1.7 particularly).

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		2. Innova is seeking, as part of the side agreement, to secure a mechanism whereby interfaces between the projects on the western area of land can be resolved. There are a number of approaches which need to be discussed and agreed regarding these interfaces. One point still under discussion relates to Innova seeking an amendment to its planning permission at NG's cost to ensure Innova's consented attenuation basin can coexist with pylon RG04 and the haul road. This approach is by no means settled and will require further thought and discussion to resolve, including a potential alternative approach if required. 3. NG disputes that Innova's subsidiary (Hall Farm Solar BESS Limited) is a statutory undertaker for the purposes of the DCO and the Planning Act 2008. For reasons previously explained, Innova considers this company is a statutory undertaker by virtue of its generation licence. Moreover, it has an option for lease which can be exercised imminently. On this basis, Innova maintains that this company is a statutory undertaker and that the proposal will cause its undertaking serious detriment. 4. On this basis, Innova will provide its preferred Protective Provisions (PPs) to be included in the DCO before close of the Examination. It does not consider that the existing PPs in the draft DCO adequately protect its interests. 5. Finally, no discussions have taken place to date with NG regarding the land rights it needs over the Hall Farm site. We reiterate the point above made in respect of Parkgate on this issue. Innova has noted the point above regarding Article 10 of the DCO for Parkgate. Innova reiterates this point for the Hall Farm development too. Innova will provide the ExA with an update at the next deadline, as well as a copy of its preferred PPs.	
REP7-583	John Stacey	Looking at NG Responses in REP6-114 to my representation REP5-301 NG Response REP6-114 The speed limits are not defined at this stage of the Project and will vary depending on site specific conditions. These will typically include limits up to a maximum speed of 20 mph. My response 21/07/2026 Speed limits at this stage of the DCO must be specified and how they will be enforced.	The Applicant respectfully disagrees with the statement that speed limits must be specified at this stage of the DCO, as mandatory highway speed limits do not apply to the temporary haul roads. The Speed Limits on Haul Roads will typically be a maximum speed of 20mph, detailed in **7.3 Outline Construction Traffic Management Plan [Revision G]**, however due to varying site conditions this may change. The investigations to inform the Haul Road speed limits will be captured during the detailed design period. The enforcement and speed limits are expected to be included with the final CTMP.
REP7-583	John Stacey	Dust NG Response REP6-114 Checks for dust soiling are unlikely to be undertaken more frequently than daily. The frequency of checks will be responsive to the level of construction anticipated and the prevailing weather conditions. Checks would be managed with local residents so that private property is not unnecessarily affected. My response 21/07/2026 The process of checking could lead to security risks, loss of privacy. The assessment concluded that with the appropriate implementation of mitigation measures there would likely be no significant effect from construction dust.	Checks for dust soiling are a part of dust monitoring, which is in itself a dust mitigation measure. Checks validate the efficacy of existing measures and enables timely responses to any unforeseen dust issues. The Applicant does not consider that the proposed dust monitoring regime would give rise to unacceptable privacy or security impacts. Any inspections would be undertaken proportionately and only where necessary, with arrangements agreed with landowners and occupiers where access is required. Should construction activities result in any loss or damage for which compensation is payable, affected parties would be entitled to pursue compensation in accordance with the relevant statutory compensation code.
REP7-583	John Stacey	NG Response REP6-114 National Grid is confident that the payments set out in its Land Rights Strategy and Payments Schedule for Assets are extremely competitive in comparison to the likely compensation that may be awarded on a statutory land compensation basis.	The Applicant notes the comparison made with compensation and voluntary payment arrangements offered on other infrastructure projects. However, different projects are promoted under different statutory, technical, landownership and commercial circumstances,

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		My response 21/07/2026 As pointed out this is significantly less than Eire Grid are offering. Could NG show their workings to support their claim that it is competitive. In terms of not being able to farm between a pylon and a field boundary will this be part of the injurious compensation claim and how will this be calculated? Additionally the restrictions that are imposed due the pylon being there along with the 30m restriction around the pylon, as well as the oversailing. Where are they accounted for? A figure of only £8,000 surely cannot account for all of this, will this be another injurious compensation claim as all of this is cannot be included in this figure as its not sufficient?	and direct comparisons between projects do not provide a reliable basis for assessing the appropriateness of compensation or voluntary payment arrangements for the Project. The Applicant's Land Rights Strategy has been developed and refined over a number of years and is applied consistently across National Grid transmission projects. The purpose of the strategy is to provide a clear, transparent and equitable methodology for acquiring land rights and agreeing voluntary arrangements with affected landowners. It includes a discretionary payment schedule intended to facilitate voluntary agreements, while ensuring affected parties retain any statutory rights that may arise under the Compensation Code. The strategy has been in place across National Grid transmission projects since 2010 and is subject to ongoing review. The Asset Payment Schedule does not remove a person's entitlement to pursue compensation where such entitlement arises under the statutory compensation code. To the extent that the acquisition of rights or the construction and operation of the Project gives rise to compensable loss, including injurious affection or disturbance, such matters would be considered in accordance with the statutory compensation framework and assessed on the facts of the individual case. The Applicant therefore does not agree that the level of payment offered under the Asset Payment Schedule should be viewed in isolation as representing the totality of compensation that may be payable in every circumstance. The assessment of any statutory compensation claim, including claims relating to severance, injurious affection, restrictions on farming operations, operational constraints associated with project infrastructure, or other compensable losses, would be undertaken in accordance with the applicable statutory compensation principles and evidence available at the relevant time. The Applicant remains willing to engage with affected landowners and their professional representatives regarding both the voluntary payment arrangements and the operation of the statutory compensation code.
REP7-583	John Stacey	NG Response REP6-114 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] provides the Limits of Deviation (LoD) visualisations for three residential properties included within 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134]. These are West Ford Farm Cottage (coded E7 in the Residential Visual Amenity Assessment (RVAA)) and Whiteheads Farm (coded E8), as requested by Braintree District Council, and Windmill House (coded F10). My response 21/07/2026 In REP5-196 Document: 8.4.12.1 Response to ISH2 Action Point 25 LoD Visualisations - Part 2 On Page 35 shows the visualisation for the nearest pylon to Whiteheads Farm. [see REP7-583 for image] The image fails to show the extent of the green line (6 m increase in height, based on the average height of all pylons up to 1200m from viewpoint). The pylon in blue (Indicative pylon location if moved perpendicular from the existing location to the nearest edge of the Limit of Deviation') does not show the full extent of the worst case scenario.	The preparation of accompanying visualisations are as set out in the Methodology section for Step 2 in **6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 / REP7-270]**. The wirelines follow the guidance included in the Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment (LI TGN 2/19). In paragraph 4.21 of LI TGN 21/19 the guidance refers to the preparation of wirelines for use during field work, as an aid to assessment and aiding presentations. LI TGN 2/19 cross references to Landscape Institute Technical Note 2/17 Visual representation of development proposals. This document has been superseded by TGN 6/191. The format follows the guidance for a Type 2 3D wireline / model. As explained in the RVAA methodology the wirelines are centred on the Project and illustrate a 90˚ included angle of view and 1.5 metres (m) viewing height from each location. In respect of the missing element of the pylon as shown on the extracted image this sits above the eye line shown in the view, because of the proximity of the pylon to the viewer. In carrying out the RVAA the massing and appearance of the full height of the pylon indicated in the visualisations, including the missing bit from the image, has been considered.

[1] https://landscapeinstitute.org/wp-content/uploads/2019/09/LI_TGN-06-19_Visual_Representation-1.pdfhttps://landscapeinstitute.org/wp-content/uploads/2019/09/LI_TGN-06-19_Visual_Representation-1.pdf

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		To do that both the longitudinal and latitudinal LOD needs to be taken into account. As the pylon is so over bearing the full height of the closest pylon cannot be shown, even without any Lod the full extent cannot be visualised.	
REP7-583	John Stacey	NG Response REP6-114 To provide consistency with the wireline visualisations shown in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5 126 to REP5-134], the LoD visualisations for these three residential properties have been prepared in the same format and location as those in that document. My response 21/07/2026 In REP-128 Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment - Clean Version - Part 2 On Page 27: [see REP7-583 for image] Looking at these visualisation they do not show the worst case, they are as planned. This is demonstrated by the details along the bottom of the image show the nearest pylon is 175m and its height is as planned not the 6m extra height it could be. NG again are completely misleading everyone and are hoping to persuade affected parties with lies.	The Applicant's position is set out in respect of updated wireline visualisations for the RVAA at Deadline 6 on Page 49 of **8.5.12 Applicants Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. The worst-case scenario visualisations are set out in **8.4.12.1 Response to ISH2 Action Point 25 – LoD Visualisations – Part 2 [REP5-196]**.
REP7-583	John Stacey	NG Response REP6-114 Whilst the pylon locations shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109] are considered the most likely route to come forward, it is accepted that the locations of the pylons could theoretically move laterally, longitudinally and increase in height within the LoD in different ways to that shown within 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]. It is not considered proportionate, however, to provide multiple illustrations to demonstrate the many possible permutations that could occur. Instead, it is considered that the visualisations shown in 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] present the reasonable 'maximum visibility' scenario. My response 21/07/2026 The visualisation as stated earlier is not the worst case scenario and its full extent is not shown.	The Applicant's position is set out in respect of updated wireline visualisations for the RVAA at Deadline 6 on Page 49 of document **8.5.12 Applicants Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. The worst-case scenario visualisations are set out in document **8.4.12.1 Response to ISH2 Action Point 25 – LoD Visualisations – Part 2 [REP5-196]**. As explained in the RVAA methodology the wirelines are centred on the Project and illustrate a 90˚ included angle of view and 1.5 metres (m) viewing height from each location. In respect of the missing element of the pylon as shown on the extracted image this sits above the eye line shown in the view, because of the proximity of the pylon to the viewer. In carrying out the RVAA the massing and appearance of the full height of the pylon indicated in the visualisations, including the missing bit from the image, has been considered.
REP7-583	John Stacey	My question in REP5-301 National Grid states that there is limited scope to move TB98 further because of electrical clearances, safety requirements and span lengths. The approximate span lengths are: • TB94 to TB95 – approximately 430 m • TB95 to TB96 – approximately 430 m • TB96 to TB97 – approximately 390 m • TB98 to TB99 – approximately 320 m • TB99 to TB100 – approximately 320 m TB97 to TB98 – approximately 355 m NG Response REP6-114 The respondent's premise that there is scope to move particular pylons where spans appear shorter is incorrect – it cannot be inferred that spans of shorter length can simply be extended where they appear to be relatively shorter than other spans.	The Applicant has responded to this previously and maintains its position as stated at Deadline 6, on pages 59-60 of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**. The Additional Detailed Design Requests were submitted again at Deadline 7, as Appendix B of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**, which includes ADDR-50 to "avoid positioning pylon TB98 and its working area in the horse paddocks to the east where practicable".

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		My response 21/07/2026 My premise must have some merit and cannot simply be incorrect. How can the distance between our neighbours pylons be over a 100m further apart than those on our land. If the line had been designed to avoid the horses and further away from our house this would not have increased the line distance significantly, a 30m extra line length would have moved the line from oversailing the horse paddock.	
REP7-583	John Stacey	NG Response REP6-114 The Applicant met with the landowner and his agent, and UK Power Networks and their agents, on 12 May 2026. The meeting involved a walk around the land holding and a detailed discussion on a number of points. The landowner and their agent were advised on site that a number of queries can be answered with reference to the 7.2 Outline Code of Construction Practice [Revision F] and documents which are publicly available on the planning website. The Applicant has responded to a number of these points via email on 23 June 2026 and is awaiting feedback from the landowner's agent. My response 21/07/2026 The response via email on 23 June 2026 did not answer our questions and just lead to more anxiety and stress, the email has been referenced in my response REP-134 Concerning the UKPN undergrounding we nor our agent have had any response to our meeting. The thought is that they will not respond and just rely on CPO. We have offered a cheaper alternative route that will overall be quicker and cheaper carry out. The ability to CPO could therefore can not be considered the last resort.	The Applicant does not agree with the suggestion that it is relying upon compulsory acquisition powers in place of engagement or that compulsory acquisition powers are being pursued other than as a measure of last resort. The Applicant has undertaken extensive engagement with the landowner and their agent throughout the development and Examination of the Project and remains committed to seeking to resolve matters through continued discussion and negotiation. As previously reported, the Applicant, the landowner, their agent, UK Power Networks and their respective representatives attended a site meeting on 12 May 2026 to review the proposals on site and discuss a range of project and land-related matters. Since that meeting, engagement has continued and plans have been issued to the AP's agent. Correspondence was issued to the affected person's agent on 24 July 2026 and dialogue remains ongoing regarding the matters raised by the landowner and their representatives. The Applicant acknowledges that the landowner has proposed an alternative route. However, the existence of alternative suggestions from affected persons does not demonstrate that compulsory acquisition powers are unnecessary or that the statutory tests cannot be met. The Applicant must assess route amendments and other proposals against a range of factors including engineering requirements, environmental considerations, land interests, programme implications, operational requirements and impacts on other third parties. The landowner's suggestions have been received and are being considered through the appropriate project review processes. The Applicant remains committed to progressing engagement and voluntary agreements wherever possible. The inclusion of compulsory acquisition powers within the Development Consent Order is sought solely as a fall-back position should voluntary agreements not be secured and to ensure that the Project, if consented, can be delivered in the public interest. The Applicant is satisfied that its continued engagement with the landowner and their professional representatives demonstrates that it has not relied upon compulsory acquisition as an alternative to negotiation and that the relevant statutory tests for the inclusion of compulsory acquisition powers are capable of being met.
REP7-583	John Stacey	*Noise* NG have updated the following document :Document: 7.2 Outline Code of Construction Practice Appendix F Outline Noise and Vibration Management Plan - Clean Version: 4.6.10 Significant adverse effects are deemed to occur where the applicable thresholds are exceeded for a period of ten or more days in any 15 consecutive days or a total number of days exceeding 40 in any consecutive six-month period. Is it acceptable that the contractor for NG can work on the basis that they will be allowed to produce noise levels that are considered to exceed the threshold for 9 days out of 15 consecutive days or 40 days in 6 months.	The assessment uses thresholds for significant noise effects as set out in the Government's code of practice for assessing noise and vibration for construction activities, BS5228, which has not changed during the assessment process. The assessment recognises that whilst there would be adverse effects from higher noise levels, these would not be considered significant unless their duration exceeds the time thresholds stated. The assessment shows that without mitigation, at Whiteheads Farm, noise levels would exceed the threshold. These are predominantly from the construction of the nearest pylon. All other activities would produce noise levels below the threshold. The contractor is obliged to reassess impacts once there is better information about plant and equipment, and finalisation of locations. They will use Best Practicable Means and other mitigation as appropriate to minimise impacts.

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		In practice that could mean that 1 in 5 days the noise level will be allowed to be over the accepted threshold over a 5 year period. Noise monitoring needs to be carried out at Whiteheads Farm and must be carried out after a complaint. If it's after a complaint there may have been exceedance for several days if not weeks. NG claim that the threshold will not be breached but we await their response questioning it. The accuracy of their figures are questionable as NG cannot even get the baseline figures right as shown in the latest version of REP6-60 Document: 7.2 Outline Code of Construction Practice Appendix F Outline Noise and Vibration Management Plan - Clean Version Table 4.2	As set out in Section 4.6 **of 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [REP7-332]**, locations for noise monitoring have not been finalised. These will be confirmed after completion of the required detailed reassessment by the contractor, and in discussion with the Local Authority.
REP7-583	John Stacey	*Recent contact from Fisher German to our Agent.* FG have emailed our land agent concerning microshocks, this unfortunately does not satisfy us that the risk to horses are eliminated if the horse are in their own paddock once the line has is in operation. Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields: A Voluntary Code of Practice (2013): https://assets.publishing.service.gov.uk/media/5a7ce34440f0b65b3de0bc1f/powerlines_vcop_microshocks.pdf . It states: "*The simpler measures, such as avoiding creating new situations particularly prone to microshocks."* *"Microshocks depend on the sizes of the objects concerned as well as the size of the field, so there is no threshold for electric field for preventing microshocks. However, in many circumstances the risk of perceiving a microshock and its severity diminish significantly as the field is reduced below 5 kV m-1, the reference level in the ICNIRP guidelines*." ICNIRP guidelines: https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf These guidelines have no studies on horses or other large animals, only on smaller animals such as mice, rabbits and monkeys. For ARU Writtle NG have offered to follow the code which may reduce the shocks but we are being sent the code when NG have proposed no such offer. If they do offer to increase the pylon high this would only because we have persuaded them and this should have not been needed. NG design has been based on the line crossing the horse paddock, even though their own walkover survey recommended them not to. If there is an accident with the horses would they claim it's not their fault?	The Applicant set out its position in respect of matters raised in the Interested Party's submission at Deadline 7 on page 60 of document **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP6-212]**. This stated that the span over the Mr Stacey's paddocks, TB97 to TB98 has sufficient clearance to ensure that the electric field is below 5 kV/m, as detailed in the Code of Practice, meaning that the provisions of the Code of Practice for the control of microshocks have in fact been met even though this is not a requirement because the land use is not one listed in the Code.
REP7-583	John Stacey	*Farm Safety for farm machinery Clearances.* In my response REP6-212 I Stated the following. In NG response REP5 -194 to my submission REP4-405, the applicant has made the claim for line safety clearance that combines can pass safely underneath . They also state " Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines". Considering the safety measures that we would need to adopt, the safest option would be to leave an uncropped 30m swathe under the line to completely eliminate the risk.	National Grid documents Design guidelines for development near pylons and high voltage overhead powerlines and Third-party guidance for working near National Grid Electricity Transmission equipment have both been provided to the AP's land agent. Ongoing engagement will review mitigations. If the guidance leads to sterilisation based on an inability to carry out existing agricultural operations then compensation will be payable on a proven loss basis.

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		In our case this would mean that if we left a 30m restriction swathe under the cables for our cropped are the length would be 1075m = 3.225 /ha To calculate our loss assuming a Gross margin £1162/ ha =£3,747 per year, I will not save any fixed costs , in fact the left area may cost us money. (Reference Nix Farm Management Pocket book, using 2nd wheat as an example) Life time cost for 50years £187,372, the lifetime could be 100 years. If NG are intending for us to operate safely under the lines as they claim such as this they are therefore are happy to pay compensation as part of the injurious compensation.	
REP7-583	John Stacey	*Heads of Terms* Whilst we have as landowners not seen the latest Heads Of Terms from NG my understanding is there are height restrictions for our crops grown within 30m of a pylon which would mean certain crops could not be grown with this 30m. I understand that this is being planned to be changed but at present there is no guarantee that this will happen.	The Applicant notes that the latest version of the Heads of Terms has been issued to the relevant land agents representing affected persons, including those acting for the Interested Party. Those agents are expected to review and discuss the updated provisions with their clients as part of the ongoing negotiations and engagement process. The Applicant does not agree with the suggestion that there is currently a restriction preventing the cultivation of crops within 30m of a tower, nor that the position is uncertain. The Applicant has listened carefully to feedback received from landowners and their professional representatives regarding the drafting of certain provisions within earlier versions of the Heads of Terms. As a result, refinements have been made through the ongoing negotiation process and revised Heads of Terms have been issued for consideration. The Applicant also notes that the presence of electrical infrastructure does not automatically give rise to restrictions on agricultural operations beyond those necessary to ensure compliance with applicable health and safety requirements. Information regarding safe working practices in the vicinity of overhead electricity infrastructure is publicly available, including through National Grid and Energy Networks Association guidance. Any operational restrictions would depend on the specific circumstances of the landholding and the activities being undertaken. To the extent that the acquisition of rights or the operation of the Project gives rise to a compensable loss, the Applicant's Land Rights Strategy expressly provides that claims for injurious affection and other appropriate heads of claim may be considered and assessed on an individual basis in accordance with the Compensation Code. The Applicant therefore does not accept that any assumed future restriction should be treated as an uncompensated impact. Where a compensable loss is demonstrated, compensation would be assessed in accordance with the relevant statutory provisions and the particular facts of the case.
REP7-584	Juliet Lyon-Smith on behalf of Mrs Gay Tollemache	I first raised concerns on my mother's behalf by email in July 2025. Then, when registering to have our say in November 2025, I explained that we had received no direct correspondence relating to [redacted text] and that a Section 56 notice dated 10 October 2025 had been addressed to my mother in error at [redacted]. Tollemache Hall is a separate property; my mother owns [redacted], which is occupied by a long-term tenant. As part of my November registration, I asked for a clear, site-specific explanation of how the proposed works might affect [redacted]. I was subsequently registered as an Interested Party under reference [redacted]. Since then, I have tried to follow the examination documents and understand the position. I am not a planning or legal expert and, given the enormous volume of material, I have used AI-assisted searches to help identify references to [redacted] within the published documents, and then tried to check those references against the source material myself.	A Land Information Questionnaire was sent to the registered owner of Title SK342534 requesting information regarding ownership and tenants on 16 October 2023. No response was received. Correspondence has been sent to the registered owner to the schedule address of Tollemache Hall in lieu of the lack of information suggesting an alternative address. This included the s56 notice which was sent to the registered address of Tollemache Hall. The Applicant is not aware of any tenants at the property. The Applicant would be happy to organise a call between Fisher German, the Applicant's lands representative, and the AP to discuss the Project and to understand the current occupation and ownership structure of the land titles. Regarding the proposed works and Book of Reference plots, these can be seen on the Planning Inspectorate website in **2.2 Land Plans – Section B [REP7-007]**, sheet 16 of 22. No rights are being sought on land under the ownership of the AP.

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		From what I can understand, the Land Rights Tracker contains a number of plots and interests described by reference to land close to [redacted], including land west and east of the property. However, I have been unable to identify my mother, Mrs Gay Tollemache, or the tenant, [redacted], in the relevant records. I fully appreciate that I may have misunderstood or overlooked something within this very large and complex set of documents, and there may be a straightforward explanation. I would therefore be grateful for clarification, given the proximity and scale of the proposed works. In particular, could the Applicant please clarify: Does any part of [redacted] fall within, border, or otherwise come within the area affected by the proposed works? Do the Applicant's records identify my mother as the owner of [redacted] and [redacted] as the long-term tenant? Could the Applicant clarify why the Section 56 notice dated 10 October 2025 was addressed to my mother at Tollemache Hall rather than [redacted]? Could any of the proposed works affect [redacted], including access to the property, construction traffic, temporary use of nearby land or future maintenance access? Could the Applicant please identify, in simple terms, the plot numbers and proposed works closest to [redacted], so that my mother, the tenant and I can properly understand what is proposed in the immediate area? My concern is simply that, despite having raised this before and having tried to follow the published documents, I still cannot establish with confidence how [redacted] may be affected. [Applicant note: copy of an email from 30 July 2025 provided – this is not replicated here as it is understood it is provided to the ExA for information rather than in direct response to Examination matters]	Works in the vicinity include UKPN works, Class 3 (underground cable system) and Class 7 (temporary use) to the North of Holly Road and East of the AP property title boundary. Class 2 (overhead line infrastructure) is also situated to the west. Access to the property will be maintained during construction. There are no proposed primary access routes in the vicinity of this area. All construction traffic will use the associated haul road which runs adjacent to the pylons within the order limits.
REP7-585	Karl Owen	Email Response to National Grid External Affairs Manager, 20 July 2026 [Applicant note: email is not copied in full in this document, however in summary it addresses recent discussions with National Grid regarding: historic interactions with National Grid and Fisher German; the consideration of the Equality Act 2010 and Public Sector Equality Duty; the proximity of the Project to Mr Owen's property; compensation and mitigation; the request for an on-site meeting prior to closure of Examination]. [In relation to the email referenced above] I bring this correspondence to the Examining Authority's attention for the following specific reasons, each of which I respectfully ask the Examining Authority to consider before making its recommendation to the Secretary of State. 1.The complete absence of any reference to the Equality Act or the Public Sector Equality Duty The email purports to respond comprehensively to my representations. My representations have placed the protected characteristics of my [redacted], and the Applicant's failure to discharge the Public Sector Equality Duty, at the centre of my case. The email contains no reference whatsoever to [redacted], to the Equality Act 2010, or to the Public Sector Equality Duty. The Examining Authority will be aware that these are not peripheral concerns but core legal obligations that the Applicant must demonstrate it has discharged before the Secretary of State can lawfully grant consent. Their complete absence from this correspondence is a matter I ask the Examining Authority to note and to require the Applicant to address directly.	Whilst the Applicant is not subject to the Public Sector Equality Duty ('PSED') under section 149 of the Equality Act 2010, the Secretary of State is, and must have due regard to, the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those with protected characteristics and those who do not, when determining the application. The Equality Impact Assessment (EqIA) which was prepared and submitted with the application **[APP-352 and REP1-067]** provided the information required by the Secretary of State to undertake that duty, although the Applicant is not itself bound by this duty. Under Article 1 of the first Protocol 1 (A1P1) of the ECHR (as enacted and given effect in UK legislation through the Human Rights Act 1998), interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

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REP7-585	Karl Owen	2. The Equality Impact Assessment — still not evidenced Across multiple representations I have asked the Applicant to confirm whether an Equality Impact Assessment specific to my daughter's circumstances was carried out, and if so when, by whom, and what it concluded. This email does not answer that question. My daughter's complete medical file was reviewed by a member of the Applicant's team during a meeting, who acknowledged its seriousness. The External Affairs Manager who authored this email was not present at that meeting and has not referenced the file or its contents anywhere in her correspondence. I ask the Examining Authority to require the Applicant to answer the EqIA question directly and on the record before the close of the examination.	An Equality Impact Assessment (EqIA) was submitted with the application **[APP-352 and REP1-067]** which considered the impact on parties with protected characteristics throughout the development and Examination of the Project. Separate individual EqIAs have not been completed for individuals because where special circumstances have been identified because of consultation and engagement and individual responses (such as Mr Owen's) to Examination deadlines, these have been used to progress targeted engagement, as is the case here. The Applicant has demonstrated its willingness to engage with the Affected Party and has already made changes to the Project following a site visit in May 2024. The Applicant acknowledges the submissions made by Mr Owen to which he refers here, which provided further evidence to support the submissions already before the Examining Authority concerning his daughter's condition, which the Applicant does not dispute. The Applicant has confirmed that it will continue to engage with Mr Owen beyond the close of the Examination to explore the most appropriate and proportionate measures to address the concerns they have raised.
REP7-585	Karl Owen	3. The Suffolk 3 realignment — presented as improvement, confirmed as worsening The email presents the Suffolk 3 realignment as a positive outcome for our household. I ask the Examining Authority to note that National Grid's own Suffolk 3 realignment report confirms that the nearest pylon moved closer to our home as a result of that change — not further away. This realignment was made after [redacted] were disclosed directly to the Applicant's Project Leader and his colleague. The framing in this email does not reflect that factual position.	As responded in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]**, the Applicant does not agree with the reported change in distance as both RG138 in its position in the application and at the Statutory Consultation are approximately 158 m from the property. At the meeting on site with two members of the Project team, the concern expressed was proximity to planned accommodation at the eastern end of the garden and the crossing of the route across the main southerly aspect. The separation from the alignment to that accommodation has been increased and the alignment repositioned to the side of the view which at the time was discussed as a beneficial change if it could be achieved.
REP7-585	Karl Owen	4. The seasonal screening point The email references vegetation to the north of our garden as providing screening for the nearest pylon. This vegetation is a deciduous hedgerow. It provides screening for approximately three months of the year. For the remaining nine months it is bare. I ask the Examining Authority to treat this mitigation claim with appropriate caution.	**6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 / REP7-270]** has assessed the property. The assessment identified the closest point of the property curtilage being located 133m from pylon RG138A. The Step 4 assessment has considered the vegetation to the north of the garden noting the visibility of the Pylon in north westerly views. The Step 4 assessment states: 'The nearest proposed pylon, RG138, would be located to the north-west of the property. A large portion of this pylon and the overhead lines would be visible year-round from the windows on the northern elevation'.
REP7-585	Karl Owen	5. The conflation of Ofgem funding constraints with the PSED obligation The email declines to fund the proposed annexe on the grounds of Ofgem price control constraints and the property being outside the DCO order limits. I accept these constraints as they relate to direct capital funding. However, they do not answer the Public Sector Equality Duty question, which is not about funding a structure but about whether the Applicant has given due regard to the specific needs of a person with protected characteristics in its decision-making. The email conflates these two distinct questions. I ask the Examining Authority to note that the PSED obligation remains unanswered.	The Applicant responded to Agenda Item 6 at Compulsory Acquisition Hearing 1 (CAH1) during the hearing itself (transcript 2 of CAH1 **[EV5-004]** refers) and in a subsequent written submission following the hearing **[REP1-138]** to confirm the position that Article 1 of the first Protocol 1 (A1P1) of the ECHR (as enacted and given effect in UK legislation through the Human Rights Act 1998) is engaged in instances where the Project requires compulsory acquisition of land or rights, or temporary possession during construction and or for the purposes of ongoing maintenance that may affect a person's peaceful enjoyment of possessions (in this context primarily their land). The compelling case in the public interest for the Project has been explained in the need case for the Project. As regards the requirement of proportionality, the Applicant considers that requirement to be met because the Applicant is able to demonstrate: • That the rights being sought are the minimum rights necessary to deliver and maintain the Project (for example, the use of temporary possession (TP) powers rather than compulsory acquisition (CA) powers where possible; and the steps that have been taken to define (as far as possible at this stage in the Project's development and design evolution) working spaces, widths, reinstatement proposals etc.

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			• That alternative options to those which are the subject of this Examination have been explored comprehensively and it can be demonstrated that on the balance of all matters that have been considered, that routeing and alignment options in this area have been reviewed and where possible changes made in response to consultation responses and feedback, and the Applicant can demonstrate this in the vicinity of this property through the realignment of the route and haul road which was implemented following the site visit in May 2024.
REP7-585	Karl Owen	6. The failed site visit and the closing deadline A site visit to[redacted] was arranged and subsequently cancelled. Despite repeated attempts to rearrange, no new date has been confirmed. The examination closes on 10 August 2026. The email confirms that the External Affairs Manager is now going on leave. I ask the Examining Authority to note that no Statement of Common Ground has been reached, that no face to face engagement has taken place at the property, and that this is not the result of any unwillingness on my part. I have been ready and willing to engage at every stage. *[The IP includes copy of email from National Grid External Affairs Manager to Karl Owen, 17 July 2026 – not replicated here at the Applicant has no comment on its own email]*	A site visit which was due to take place on 7 July was unfortunately cancelled because an emergency encountered by one member of the Applicant's team during their journey to the meeting prevented them from attending, so the meeting would not have been productive for either party. In follow up correspondence, the Applicant confirmed that it was committed to continuing engagement and rearranging the meeting and a meeting has been arranged for August 6 2026 at the Affected Party's property. The Applicant reminds the Examining Authority that engagement has indeed taken place at the property in 2024, and that this engagement led to design changes to the Project. The Applicant does not consider that a Statement of Common Ground is applicable in this situation because the facts of the Affected Party's circumstances are not disputed and nor is the legislative, policy and regulatory framework within which the Applicant must operate. The Affected Party has set out their position throughout the Examination, and the Applicant has responded to these representations. Engagement will continue after the close of the Examination to develop solutions tailored to the circumstances described by the Affected Party.
REP7-585	Karl Owen	Statement of Acoustic and Atmospheric Impact [Applicant Note: given the descriptive nature of the submission, and a large number of redactions, the full text is not copied – please refer to REP7-585]. The Applicant has however summarised the submission and extracted relevant verbatim quotes for comment where appropriate. Summaries are provided in italics.] What this place is – Before • Description of the existing environment of the Respondent's property and surroundings What this place will become – After' • When construction begins, this acoustic world will be destroyed. Not reduced. Not diminished. Destroyed — for the duration of a construction programme lasting up to three years, and permanently altered thereafter by the operational noise of 400kV overhead transmission lines.' • The construction of major infrastructure of this scale generates continuous, high-intensity noise: piling, excavation, concrete delivery, crane operations, HGV reversing alarms, generator noise, and the constant movement of heavy plant. These sounds, alien to this landscape, will arrive at [redacted] amplified by the same acoustic funnel that currently carries birdsong. The prevailing south-westerly wind — funnelling up from the Gipping Valley and blowing directly toward the cottage from the adjacent construction site to the west — will carry dust and noise straight to the property with no natural barrier between them. This family cannot run their dishwasher in the evening — the noise is too disturbing for [redacted]. They are being asked to live, for up to three years, with piling rigs, reversing alarms, and HGV movements as the soundtrack to every waking hour.	With regards to construction noise, this is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [REP7-284].** The assessment shows that with sufficient standard mitigation measures, significant adverse effects from construction noise can be avoided. Various commitments for construction noise and vibration in **7.2 Outline Code of Construction Practice [Revision H]** requires the Main Works Contractor(s) to prepare detailed construction noise and vibration assessments, detailing methodologies, mitigation, working periods, and monitoring proposals, and submit these for approval by the relevant local planning authority prior to the start of works. This process ensures sufficient oversight by the relevant local planning authority for all works. With regards to operational noise from the proposed overhead line, this is scoped out of the Environmental Statement (ES) on the basis that a low noise conductor is proposed and secured by commitment in **7.2 Outline Code of Construction Practice [Revision H].** With the use of a low noise conductor, adverse noise effects are not expected, even during worst-case 'wet' conditions directly underneath the line. Although scoped out of the ES, information regarding operational noise from the proposed overhead is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [REP7-294].**

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REP7-585	Karl Owen	The Existing Pylons — What 400kV Actually Sounds and Feels Like • Description of experience of sound from existing 400kV pylons Those pylons are approximately 30 metres tall. The Norwich to Tilbury pylons are approximately 55 metres tall — nearly twice the height. They are also designed with a capacity for up to 700kV — nearly double the current operational voltage. This is built into the engineering specification. The probability of this higher voltage being used at some point in the infrastructure's lifetime is, by definition, greater than zero. If and when it is, the acoustic and electromagnetic impact on [redacted] will be substantially greater than what is currently being represented to the Examining Authority. This question deserves a specific and transparent answer from the Applicant.	The Applicant clarifies that the existing pylons as described by Mr Owen cannot be 30m tall and 400kV. This is because all 400kV capable lattice towers on the Applicant's system with a traditional vertical three cross arm two circuit configuration ('L6 towers') are greater than 40m tall; this is required for 400kV clearances. The majority of existing towers in East Anglia are all L6 towers in the range of 50 to 55m tall. Smaller 'L7c' pylons operate at 132kV and are 27m tall. As such, any vertical three cross arm two circuit lattice towers of circa 30m tall would be 132kV towers and not suitable for 400kV operation. The towers proposed in the Project are L6 type vertical three cross arm, two circuit lattice configuration towers up to 55m tall. As highlighted above these are standard towers used in the UK for 400kV clearances and common in East Anglia. L6 towers are certainly not capable of 700kV operation which would require even greater clearances and taller towers for vertical three cross arm two circuit lattice configuration. For the Project, the L6 tower is designed for and would be operated at 400kV, along with connections in existing substations and new substations. Therefore 400kV is the design for the lifetime of the circuits and connecting infrastructure. With regards to operational noise from the proposed overhead line, this is scoped out of the Environmental Statement (ES) on the basis that a low noise conductor is proposed and secured by commitment in **7.2 Outline Code of Construction Practice [Revision H].** With the use of a low noise conductor, adverse noise effects are not expected, even during worst-case 'wet' conditions directly underneath the line. Although scoped out of the ES, information regarding operational noise from the proposed overhead is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [REP7-294]**.
REP7-585	Karl Owen	The Visual Reality — A Chocolate Box Cottage and a Metal Monstrosity • Description of experience of visual effects of existing pylons That existing pylon is approximately 30 metres tall. The pylon that will stand closest to will be approximately 55 metres tall — nearly twice as high. From every direction from which can be seen across the flat open Suffolk landscape, that pylon will appear to rise over and out of the cottage, dominating the previously open Suffolk sky, running ten times higher than the cottage itself. An ancient chocolate box Suffolk dwelling, centuries old, beneath a metal monstrosity of modern man.	**6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 to REP7-270]** has assessed the property. The assessment identified the closest point of the property curtilage being located 133m from pylon RG138. The RVAA concluded there would be a medium magnitude of visual effect. In considering the movement of the Project within the LoD closer to the curtilage the assessment considered that this would give rise to a high magnitude of visual effect. The Step 4 assessment looked at the worst-case scenario for this property placing the pylon at the eastern edge of the LoD and 85m from the curtilage. The RVAA concluded "due to intervening vegetation creating filtered views in the direction that faces the Project and the northern elevation experiencing views of the Project at a distance" the Project would not breach the RVAT.
REP7-585	Karl Owen	The Physical Vulnerability of the Cottage [Redacted] is a centuries-old rural dwelling whose physical fabric offers minimal protection against the noise and dust this project will generate. Some windows are simple wooden frames with single panes of glass that are approximately 100 years old. The double glazed windows are basic units installed over 15 years ago, long past their effective working life, with degraded seals. The house accumulates dust and pollen at a remarkable rate — its age means it has gaps, voids, and spaces in old dusty loft spaces through which particulates travel freely. The prevailing south-westerly wind blows directly from the construction site toward the cottage. There is no natural barrier between the two. Construction dust — concrete particles, excavated soil, diesel particulates — will be carried on that wind directly into and onto the property throughout the construction period. For a household that already manages dust accumulation at an unusual rate due to the building's age and construction, the additional dust load from an adjacent major construction site will be significant, sustained, and harmful.	The Applicant acknowledges the concerns raised regarding the age and condition of the property. However, the assessment of construction dust effects has been undertaken using a recognised methodology which considers the proximity and sensitivity of receptors, including residential properties located close to the works. The property is located within 250 m of the Order Limits and has therefore been taken into account within the assessment. The Applicant does not agree that significant adverse dust effects are likely. **6.7 Environmental Statement Chapter 7 - Air Quality [REP7-178]** concludes that with appropriate implementation of mitigation secured in **7.2 Outline Code of Construction Practice [Revision H]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [REP7-328]** there would be no likely significant effect on receptors from construction dust. Additionally, **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [REP7-328]** requires a further construction dust assessment to be

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			carried out prior to the commencement of each work package by the Main Works Contractor(s), when detailed design and construction activity information is available. At that stage mitigation will be tailored to the site-specific context to ensure dust effects remain appropriately controlled throughout construction. Accordingly, the Applicant considers that the effects of construction dust have been appropriately assessed and that a robust and enforceable mitigation framework is secured through the DCO. On this basis, no likely significant effects are predicted at the property.
REP7-585	Karl Owen	The Occupier Disturbance Case — A Breakdown • We are seeking occupier disturbance [redacted] for the following specific heads of loss, each of which is directly caused by this project: • Heads of loss: quiet enjoyment; loss of outdoor amenity; dust intrusion; [redacted]; permanent loss of amenity; generational impact; impact to seven dogs. These are not abstract inconveniences. They are specific, documented, and in several cases permanent losses suffered by a real family in their permanent generational home. £40,000 across six people and three years — approximately £2,200 per person per year — is a modest and proportionate ask for what this project takes from them.	As set out above, the Applicant responded to Agenda Item 6 at Compulsory Acquisition Hearing 1 (CAH1) during the hearing itself (transcript 2 of CAH1 **[EV5-004]** refers) and in a subsequent written submission following the hearing **[REP1-138]** to confirm the position that Article 1 of the first Protocol 1 (A1P1) of the ECHR (as enacted and given effect in UK legislation through the Human Rights Act 1998) is engaged in instances where the Project requires compulsory acquisition of land or rights, or temporary possession during construction and or for the purposes of ongoing maintenance that may affect a person's peaceful enjoyment of possessions (in this context primarily their land). Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights. As regards the requirement of proportionality, the Applicant considers that requirement to be met because the Applicant is able to demonstrate: • That the rights being sought are the minimum rights necessary to deliver and maintain the Project (for example, the use of TP powers rather than CA powers where possible; and the steps that have been taken to define (as far as possible at this stage in the Project's development and design evolution) working spaces, widths, reinstatement proposals etc. • That alternative options to those which are the subject of this Examination have been explored comprehensively and it can be demonstrated that on the balance of all matters that have been considered, that routeing and alignment options in this area have been reviewed and where possible changes made in response to consultation responses and feedback, and the Applicant can demonstrate this in the vicinity of this property through the realignment of the route and haul road which was implemented following the site visit in May 2024. • Any interference in respect of the provisions of A1P1 is further addressed by the statutory compensation regime under the Compulsory Purchase Compensation Code, which ensures the Affected Party is placed, so far as is possible, in no worse a financial position than had the acquisition not occurred. The Applicant's position, therefore, is that the fair balance required by A1P1 is achieved, and that the interference with the Affected Party's rights is proportionate to the legitimate public interest in delivery of the Project.
REP7-585	Karl Owen	Enforced Incarceration, Access Deprivation, and Occupier Disturbance *[Applicant Note: given the descriptive nature of the submission, and a large number of redactions, the full text is not copied – please refer to REP7-585]. The Applicant has however summarised the submission and extracted relevant verbatim quotes for comment where appropriate. Summaries are provided in italics.]* The Examining Authority's Site Visit — 30 April 2026	The concern expressed is noted and understood. However, the Applicant believes the concerns are based on a misunderstanding, because:- 1. Lambert's Lane and Stonham Road are not proposed haul roads or primary access routes which means access will remain unaffected. 2. There is a proposed crossing of Lambert's Lane where construction traffic on the haul road within the field will intersect.

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		• *Acknowledgement of ExA's site visit on 30 April 2026* 'The Prison at [Redacted] – Forced Incarceration' • *Description of existing context to respondent's property and personal circumstances* • The Applicant's proposals make Lambert's Lane and Stonham Road haul roads for the construction programme — for a period of up to three years, and potentially longer. Major infrastructure projects of this scale routinely overrun their estimated programmes. During that period, access along those roads will be at National Grid's discretion. The family will be able to leave their home, and return to it, only when National Grid's construction operations permit. • This is, in practical terms, enforced incarceration. National Grid holds the keys to this family's access to the outside world. They decide when the family is released and when they may return. They have chosen — through three successive decisions to relocate the haul road, each time bringing it closer to the only access route — to place this family in this position. The family did not choose it. They committed no act that justifies it. They are being held, for up to three years or more, because of decisions made by a large organisation that has not once offered to meet with them. Three Moves of the Haul Road — A Chronology of Choices • It is important to understand that this family's predicament is not the result of geographical necessity. It is the result of choices — specifically, three successive decisions by the Applicant to relocate the haul road, each of which has materially worsened the family's position: • The original haul road ran through the eastern part of the property, directly adjacent to the outbuilding identified as the annexe site for the family's [redacted] • Following the resident's direct representations to National Grid Project Leader [redacted] — in the presence of Suffolk County Councillor [redacted]— the haul road was moved to the western side of the property, adjacent to Lambert's Lane. At the same time, the nearest pylon was moved closer to the cottage, as confirmed in the Suffolk 3 realignment report. • The haul road has since been moved again — onto Lambert's Lane itself, the road the family uses a minimum of sixteen times daily for work, school, medical appointments, and everyday life. Each move was a choice. The Applicant chose, three times, where to place the haul road. Three times, those choices have worsened the impact on the only family with no alternative access. The family did not choose this. The Applicant did.	3. No construction traffic will be permitted to turn off the haul road and join the public highway in this location. The Applicant has been consistent about this in the evidence given at previous deadlines. The designs have not changed since this evidence was given, which is why the Applicant believes the concern expressed is based on a misunderstanding about what is proposed.
REP7-585	Karl Owen	David and Goliath — The Inequality of Arms • National Grid is one of the largest infrastructure companies in the world. It has unlimited legal resources, a permanent team of planning and legal specialists, and years of experience navigating Development Consent Order examinations. The resident of [redacted] is a private individual with no legal representation, no planning expertise, and no prior experience of this process. • The resident did not know the haul road had been moved for the third time until very recently. Information that was publicly available in the examination documents was not communicated to him directly. He has had to educate himself about Holford Rules, Public Sector Equality Duties, DCO examination procedures, and biodiversity net gain — while simultaneously caring for a household that includes a [redacted],	As stated above, the Applicant has engaged with the Affected Party and will continue to do so beyond the end of the Examination. The Affected Party's response as set out here has highlighted some misunderstandings in relation to the proximity and nature of construction activity on Lamberts Lane and Stonham Road, in relation to the proximity of the closest pylon following the realignment, and in relation to access to the nearby woodland. The Applicant has sought to address these misunderstandings and will continue to do so, through continued engagement with the Affected Party.

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		managing an ancient woodland, and fighting to protect a home his family has lived in for thirty years. • The Applicant's Project Leader told this resident to his face that the Holford Rules were just guidelines. The rules that exist specifically to protect people in this resident's position were dismissed, casually, by the very person responsible for applying them. That dismissal was not an accident. It reflects an institutional confidence that comes from knowing you have unlimited resources and your opponent has none. The Examining Authority exists precisely to provide a level of protection to people in this position. The resident asks the Examining Authority to consider whether, in all the circumstances of this case, the Applicant has behaved in a manner consistent with its legal obligations and its duty to engage constructively with affected communities — or whether it has relied on its superior resources to avoid doing so.'	
REP7-585	Karl Owen	No Engagement — No Meeting — No Mitigation Offered • Despite being explicitly informed, in person, by this resident of the following matters — the resident has not received a single offer of a meeting from the Applicant, nor any mitigation proposal of any kind: — • A [redacted] under the Equality Act 2010 • Self-harm resulting in permanent scarring directly connected to this proposal • Fear for a family member's life expressed directly to the Project Leader — • Severance from the household's only source of heat • A haul road on the only access road to the property • Acknowledged breaches of the Holford Rules at this location • A child in his most formative years facing three years of construction disruption • A planned annexe for a person with [redacted] made urgently necessary by this proposal The Applicant has known all of these facts. It has chosen, at every stage, not to engage. That is not an oversight. It is a decision. And it is a decision that the Examining Authority should weigh carefully when considering whether the Applicant has discharged its obligations under EN-5, the Equality Act, and the general duty to engage constructively with affected communities. What We Are Asking For — The Occupier Disturbance Case • We are seeking occupier disturbance compensation of £40,000. This figure — approximately £2,200 per person per year across six occupants and three years — is modest given the totality of what this family will endure. We set out below the specific heads of loss it is intended to address: • *Specific heads of loss: enforced restriction of access; loss of quiet enjoyment; loss of outdoor amenity; dust intrusion; permanent loss of amenity; psychological and emotional impact; generational dimension* *[copy of speech for 23 June 2026 and email dated 9 July 2026 to Planning Inspectorate Case Team provided – see REP7-585. Applicant has not replicated here as it has no comment on these submissions provided to the ExA for information].*	The Applicant is aware of the circumstances which the Affected Party has described and its obligations under the Equality Act, has met with the Affected Party twice, once at their property and once at the hearing venue during CAH3. A further meeting is proposed for August 6, to replace a meeting which was unfortunately cancelled due to circumstances beyond the Applicant's control on the day. The Applicant takes its duties to all Parties with protected characteristics seriously and continues to engage with those parties where specifically challenging circumstances prevail, and will continue this engagement. There is no decision not to engage and the Applicant has set out all of the engagement undertaken in the process of developing the scheme in the **5.1 Consultation Report (Revision B) [REP7-084]**. The Affected Party refers themselves in other parts of this representation to meetings which have taken place which demonstrate the Applicant's willingness to engage. The Applicant notes the financial compensation request that the Affected Party has outlined here, and also acknowledges other breakdowns of various costs that the Affected Party is seeking and through ongoing engagement seeks to ensure that it has all the facts at its disposal to make the case to the Regulator for a reasonable and proportionate resolution to the Affected Party's request.
REP7-559	Lower Thames	*Draft DCO amendments*	The Applicant can confirm that the remaining proposed amendments to article 59 were incorporated in the **3.1 Draft DCO [REP7-064]** submitted at Deadline 7, subject to a minor

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	Crossing Project	NH LTC welcomes the amendments made by the Applicant to the draft DCO submitted at Deadline 6 [REP6-031], which broadly reflect the amendments proposed by NH LTC in Appendix 1 of its Deadline 6 submission [REP6-153]. NH LTC has been in discussions with the Applicant and understands that its remaining proposed amendments to Article 59, as set out in its Deadline 6 response, are to be incorporated in the version of the draft DCO being submitted for Deadline 7.	drafting tweak which the Applicant does not consider alters the substance of the protections for LTC.
REP7-559	Lower Thames Crossing Project	*Protective Provisions* NH LTC and the Applicant are in ongoing discussions relating to the drafting of the protective provisions for the benefit of the Lower Thames Crossing project. NH LTC understands that the Applicant is due to submit its preferred version into examination at Deadline 7 as part of its updated draft DCO. Whilst discussions are continuing, NH LTC anticipates that some differences between the parties will remain. An update on the position will be provided at Deadline 8.	The Applicant can confirm that it has now agreed protective provisions with LTC and these have been included in **3.1 Draft DCO [Revision H]** at Deadline 8.
REP7-560	Ministry of Defence	The Ministry of Defence (MoD) is a Crown authority for the purposes of Section 135 of the Planning Act 2008 and is the beneficiary of existing rights in certain plots of land situated within the Order limits for the proposed Norwich to Tilbury Project (the "Project"). The plots of land in question are as follows: (1) Plots 16/76, 16/81 & 16/83 (Section B); (2) Plots 17/39,17/48, 17/49, 17/50, 17/52, 17/54, 17/55, 17/58, 17/59, 17/60, 17/61, 17/62, 17/63,17/64, 17/65, 17/66, 17/67, 17/70, 17/76, 17/85 (Section B); (3) Plots 6/38, 6/39, 6/41, 6/42, 6/52, 7/1, 7/2, 7/3, 8/1, 16/23 (Section C); (4) Plots 16/23a, 16/26, 16/30, 16/33, 16/34, 16/36, 16/36a (Section C); and (5) Plots 6/24e, 6/71, 6/71f, 6/84a (Section H). National Grid Electricity Transmission Plc (the "Applicant") has confirmed that, once made, The National Grid (Norwich to Tilbury) Order 20[xx] (the "Order") will not include any provision(s) authorising the compulsory acquisition of third party interests in land belonging to the MoD Land Management Services (LMS) and, as such, no consent pursuant to Section 135(1) has been sought in connection with the Order. Section 135(2) consent is, however, required for an order granting development consent to include provision(s) which apply to Crown land or rights benefiting the Crown. Please, therefore, accept this email as constituting the MoD's written consent, issued pursuant to and for the purposes of Section 135(2) of the Planning Act 2008, to the inclusion of such provisions currently within the draft Order as may apply in relation to each of the plots of land listed above. For the avoidance of doubt, the MoD also confirms its consent to the inclusion of Article 42 (Crown rights) within the draft Order. This consent is given on the basis of the draft Development Consent Order (Revision E) [REP5-065] and accompanying application documents currently before the Examining Authority. The MoD LMS confirms that this email is provided for the purposes of Section 135 of the Planning Act 2008 only and may be relied upon by the Applicant, the Examining Authority and the Secretary of State in the examination of the Order.	The Applicant welcomes and thanks the Ministry of Defence for its representation and for providing its written consent pursuant to section 135(2) of the Planning Act 2008. The Applicant notes the Ministry of Defence's confirmation that it consents to the inclusion within the draft Development Consent Order of those provisions applying to the identified Crown interests, including Article 42 (Crown rights), on the basis of the **draft Development Consent Order (Revision E) [REP5-065]** and accompanying application documents. The Applicant is grateful for the constructive engagement of the Ministry of Defence throughout the Examination process and has no further comments on this representation.
REP7-561	National Highways	*Draft DCO Submitted at Deadline 6* As noted at Issue Specific Hearing 4 and in its Deadline 6 comments on any further information or submissions received by deadline 5 and 5A [REP6-155], National Highways is concerned that agreement may not be reached on the form of the	The Applicant has further amended the protective provisions in favour of National Highways to: a) remove reference to specified works captured by paragraph 67(2) in paragraph 10(5); b) Include an indemnity in favour of National Highways; and

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	protective provisions included in Part 5 of Schedule 16 for the benefit of National Highways in its capacity as strategic highway authority. However, it is noted that significant changes have been made by the Applicant to the protective provisions contained in the latest draft DCO submitted at Deadline 6 [REP6-031] which appear to narrow the issues between the Applicant and NH. Notwithstanding the amendments to the DCO at Deadline 6, the dDCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions and the Requirements. Draft DCO Submitted at Deadline 6 - Protective Provisions The form of the Protective Provisions which NH is seeking, against those that currently appear on the face of the dDCO is annexed at Appendix 1 with the changes required by NH shown in track changes. It is noted that a number of the points between NH and the Applicant as of Deadline 6 have been updated in the latest dDCO [REP6-030] and [REP6-031]. Accordingly, it is noted that the PP's in the latest dDCO now include the following requirements previously requested by NH in its Deadline 6 submission [REP6-155] and the following matters now appear to be agreed: - (a) Bond and security and phasing requirements. (b) Definition of "Condition surveys of the SRN". (c) Scope of the protective provisions – the definition of "specified works" in paragraph 2 now applies to land which National Highways has an interest. Whilst the land may not be highway, it could still relate to NH's function. (d) Position on prior approvals: Paragraph 4 and Paragraph 7(1) no longer carve out works that are 5.5m above the highway surface, from the prior approval provisions. (e) Deemed consent: Para 7(5) has been deleted entirely and a new 7(7) inserted which disapplies deemed consent means that any reference to deemed consent in any of the articles of this Order shall not apply to any application for consent, agreement or approval required or contemplated to be given by National Highways. (f) Insurance (paragraph 17): the minimum sum of £50 million pounds in respect of any one claim against any legal liability for damage loss or injury to any property or any person as a direct result of the execution of specified works or use of the strategic road network by the undertaker has been agreed. (g) Dispute resolution/expert determination over arbitration: Expert determination appears now to have been agreed. This is preferred by NH due to the speed of the process and the often-technical nature of the points in dispute being more suited to determination by an Engineer or other highway professional. Notwithstanding the above, there remain matters that are unresolved between the parties. These are set out below: - (a) "Commuted sum": The reference to payment of the commuted sum in paragraph 10(5) also needs to remove reference to specified works captured by paragraph 67(2) (b) Other changes in the definitions at paragraph 2 relate to unnecessary or duplicate wording: Paragraph 1(3) which provides that the protective provisions do not apply were the works are regulated by the 1991 Act, or the street works articles is wholly in appropriate. As noted, the protective provisions need to address all provisions which authorise the interference with statutory powers belonging to NH and/or grant the	c) Paragraph 9(3) as requested by National Highways has been included to cover contractual costs incurred by National Highways. In relation to the outstanding points in dispute noted by National Highways: a) Paragraph 1(3) has precedent in multiple recently made DCOs including the Cambridge Waste Water Treatment Plant Relocation Order 2025, the Medworth Energy from Waste Combined Heat and Power Facility Order 2024, the Gatwick Airport Northern Runway Order 2025, the M5 Junction 10 Improvements Scheme Order 2025 and the Yorkshire Green Order 2024. In light of this, the Applicant does not see a basis for its removal in this instance. b) Paragraph 7(3) as proposed by National Highways is, in the Applicant's view, unnecessarily extensive and not in line with many made DCO precedents including the Yorkshire Green Order 2024. **c)** The land provisions included in the Applicant's preferred protective provisions reflect the Applicant's position in respect of compulsory acquisition. Under the proposed protective provisions in the **3.1 Draft DCO [Revision H**], the Applicant cannot acquire land within the SRN without the consent of National Highways. In relation to the acquisition of rights, this is a key point of disagreement between the parties which the Applicant provides its detailed position in respect of within the **8.34 Applicant's closing statement with a summary of areas of disagreement [Revision A]** within paragraphs 7.10.16 to 7.10.34.

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		Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. (c) Prior Approvals and Security: paragraph 7(3) which states that certain articles should not be exercised over the SRN or land which NH has an interest without the express consent, needs to capture all the articles referenced in the NH's template protective provisions which include powers associated with compulsory acquisition. This ensures that NH is aware of the progress of the specified works affecting the SRN, the scope of those operations, the potential impact to road users and to ensure that compulsory acquisition is managed appropriately and proportionately. Prior approval is agreed in relation to Articles 16, 20, 21 and 22 in the protective provisions in the dDCO. This paragraph also needs to reference Articles 11, 12, 13, 14, 16, 17, 18, 19, 24, 25, 26, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 47, 49 and 50. The detailed explanation of why the provisions need to be exercised only with NH's approval where the powers are to be exercised over the SRN or land within NH's ownership is set out in length in the table in section 6 of NH's Relevant Representation. (d) Indemnity (paragraph 18): Due to NH not holding a budget to cover any costs, claims or expenses for the Project NH must be held harmless for the construction, maintenance and operation of the Authorised Development and any resultant impacts. It is common practice for statutory undertakers to be indemnified in such circumstances and the Applicant on any DCO that it is affected would seek similar provisions. (e) Land provisions (paragraph 20): This paragraph needs to mirror NH's template protective provisions. NH need to be able to call for a freehold transfer of land within the extent of strategic road network boundary which is not in the ownership of National Highways but has been acquired by the undertaker for the purposes of carrying out the specified works. No part of the strategic road network or land owned by National Highways should be compulsorily acquired, nor existing rights of NH extinguished or apparatus interfered with in respect of any third-party property, except with the consent of National Highways. (f) Payments (paragraph 9): NH do not hold a budget to cover any costs associated with the Project and paragraph 9(c) needs to be included to enable the recovery by NH of contractual costs properly payable to the highway operations and maintenance contractor as a consequence of any specified works, including costs incurred by the highway operations and maintenance contractor in carrying out the tasks referred to in sub-paragraphs (a) and (b) of paragraph 9(1)). It appears this has been agreed and accepted by the Applicant but since it remains in square brackets the position is not clear.	
REP7-561	National Highways	*Draft DCO Submitted at Deadline 6 - Requirements* The dDCO [REP6-031] has not been updated to address NH's concerns raised in its Relevant Representations on Requirements (see [RR-2657] (paragraph 6), Written Representations [REP1-192] as further supplemented by its Deadline 2 comments [REP2-043] paragraph 2.5 and Table T1.2 (page 24 onwards) and discussion at ISH2 on 28 and 29 April [REP-343] save for the amendment to Requirement 4(1) which is welcomed. In the Applicant's comments on any Further Information or Submissions Received by Deadline 5 Final Issue A [REP6-114], at REP5-253 the Applicant comments that "NH's objections as previously set out are noted and have been responded to by the Applicant previously including in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] (Appendix T, including the further detail provided in Table T1.2 as well as in	The Applicant notes National Highways' request for an amendment to Requirement 4 so that National Highways is an approval body for the CTMP. This amendment was inserted at Deadline 5 in Revision E of the **3.1 Draft DCO [REP5-060].** This addresses National Highways' comments in relation to Requirement 4 and 7. In relation to National Highways' comments in respect of requirements 8, 9 and 10, these are addressed in detail in the row below. In relation to National Highways' comments in respect of the 5 day period within paragraph 2 of Schedule 4, the Applicant has provided submissions throughout the examination on this point and does not seek to repeat them here. The Applicant adjusted its proposed time period following engagement with host authorities from 5 days to 5 business days (compared to 7 business days on Bramford to Twinstead). In the circumstances of this

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	Table T1.1), 8.8.1 Applicant's Comments on Written Representations [REP2-029] (page 62), 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070] (pages 141 – 149) and 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] (Table 2.3, page 28). It is not clear that NH raise a new issue that requires a further additional response". NH notes that, whilst the Applicant may have previously responded to NH's comments, the responses provided do not adequately address NH's concerns, and NH's concerns therefore remain outstanding as set out in NH's Deadline 6 Submission [REP6-155]. NH requires these points to be properly addressed. For ease of reference, NH's position is again set out below and in Appendix 2 attached. [Applicant note: National Highways submitted their amendments to the Requirements in the dDCO in Appendix 2. These are considered in the row below.] By way of summary, there are several Requirements included in Schedule 3 of the dDCO which NH has an interest and would expect to be consulted on namely: 8 (retention and removal of trees, woodland and hedgerow), 9 (Re-instatement planting plan) and 10 (Re-instatement schemes) it is noted that the latest version of the dDCO does not address NH's concerns. In relation to Requirements 8, 9 and 10, NH require to be consulted where works affect the SRN or relate to land NH have an interest in. This is not unreasonable. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. On Requirement 7 (Construction hours), NH has previously asked that sub-paragraph (1) which provides for variations to the core terms includes consultation with National Highways. National Highways still have major concerns regarding construction traffic and so NH may need construction traffic to be operated outside peak hours depending on ongoing modelling and discussions with the Applicant regarding the Assessment, which National Highways would want to be fed into this Requirement. This is explained further in section 3 below. On the Discharge of Requirements, paragraph 2, provides that where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application. Paragraph 2 (2) provides, "If the relevant authority considers further information is necessary and the requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 business days of receipt of the application, notify the undertaker in writing specifying the further information required" and paragraph 2 (3) provides "If the requirement specifies that consultation with a requirement consultee is required, the relevant authority must issue the consultation to the requirement consultee within 5 business days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the requirement consultee within 5 business days of receipt of such a request and in any event within 15 business days of receipt of the application." NH's position is that were it to be required to be consulted, 5 days is not enough time for NH to respond, and the time period should be extended. In addition, to the above, as per NH's comments as set out in paragraph 7.8 of this submission, NH also requires an amendment to Requirement 4 so that NH is an approval body for the CTMP before commencement of the development's construction.	Project of critical national priority, National Grid considers its proposed timescales in this case to be sufficient and appropriate.

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		This amendment is necessary due to unresolved traffic and transport issues, which would otherwise constrain NH's ability to ensure the safe operation of the SRN.	
REP7-561	National Highways	*Appendix 2 Amendments to the Requirements in the dDCO* [The IP provides a summary of the outstanding matters and changes that National Highways are seeking with comments. The comments are reproduced as follows but the draft amendments have not been reproduced.] Requirement 4 and Requirement 7: [the Applicant notes National Highways defers to its comments on the Outline Construction Traffic Management Plan. These are dealt with separately below.] Requirement 8. Retention and removal of trees, woodland and hedgerows As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the proposals Requirement 9. Reinstatement planting plan As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the reinstatement planting proposals. Requirement 10. Reinstatement schemes NH seek the reinstatement of the A120 verge within 6 months following the use of the access ceasing. This is in the interest of maintaining the safe and efficient operation of the SRN. 21 months is an unreasonably long period. Inclusion of the drafting in red would address NH's concern.	The Applicant notes National Highways' comments in respect of these requirements but does not propose any changes to the drafting due to the following reasons: • Requirement 8: Article 50(4) of the **3.1 Draft DCO [Revision H]** already makes any removal of trees subject to the consent of National Highways save for those that are identified on the plans provided at Part 7 of Schedule 2 of the **3.1 Draft DCO [Revision H]** which National Highways are already aware of. • Requirement 9: National Highways has approval rights over the management plans to the extent they are relevant to the operation of the SRN, under Requirement 4(1). This includes the Landscape Ecological Management Plan with which any reinstatement planting plan must be in accordance with. • Requirement 10: As noted in several previous submissions throughout the examination, 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 the 3.1 Draft DCO (Revision H), in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.
REP7-561	National Highways	*Comments on the Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [REP6-116]* National Highways response on Oral Summary of the Applicant's Case In relation to the final paragraph, NH's principal position has always been that the Applicant should use powers derived from NRSWA to undertake the works required for the overhead lines. NH does not accept the suggestion that it should be precluded from evolving its position and thinking in relation to the DCO. National Highways response on Post Hearing Update NH's position is that the Applicant should not be able exercise its CA powers without NH's consent. Further, NH have confirmed on a number of occasions that it is prepared to grant an easement for the underground cabling where works are outside of the operational zone and within the subsoil. If the Applicant has CA powers as a fall-back position as is being suggested, this will risk the safe operation of the SRN and would not meet the statutory tests for CPO. Whilst it is accepted that the terms of an easement are not yet agreed, it is in NH's interest to agree terms and work is on- going in this regard. An update will be provided at Deadline 8. In relation to the oversail, please refer to our response at Deadline 6 [REP6-154].	The Applicant disagrees with National Highways' position on this matter and sets out its detailed position in **8.34 Applicant's closing statement with a summary of areas of disagreement [Revision A]** within paragraphs 7.10.16 to 7.10.34. These paragraphs are also provided in the rows below in response to National Highway's comments on compulsory acquisition for ease of reference.
REP7-561	National Highways	*Comments on any further information/ submissions received by Deadline 6* It is noted that the Statement of Reasons – Appendix B – Schedule of Negotiations (Final Issue F) [REP6-039] has been updated in respect of the NH plots only to remove reference to C-18/15. Despite indications to the contrary by the Applicant, no other NH	The Applicant has engaged extensively with National Highways in order to understand the nature of its current interests within the Order Land. As a consequence of that engagement, it was confirmed that National Highways no longer holds an interest in any of the following plots of Order Land:

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		plots have been removed. In addition, the Land Rights Tracker (Final Issue F) has not been updated Deadline 6 [REP6-044]. The Applicant has updated the Statutory Undertaker Tracker (Final Issue E) [REP6-121]. In relation to NH, the current position column largely reflects NH's position and, importantly, confirms that the Protective Provisions included in the Deadline 6 version of the DCO are not agreed with NH. This remains the position. NH's preferred Protective Provisions are set out in Appendix 1. Please see Table 3 below in which provides NH's response to the Applicant's comments on any Further Information or Submissions Received by Deadline 5 Final Issue A [REP6-114].	• B13/12 • B13/15 • G6/37 • G6/38 • G6/40 • G6/45 • G6/46 • B12/108 • B12/109 • G6/36 • G6/60 • B12/94 • B12/95 • B12/96 • B12/113 • B12/112 • B13/2 • B13/5 • B13/7 • C18/38 • F10/34 • G6/19 • G6/56 • G6/58 • G6/62 • G6/63 • G6/64 • G6/68 Whilst these plots remain in the Book of Reference submitted at Deadline 8, the Applicant will continue to engage with National Highways following the close of the Examination in order to ensure that appropriate allowance is made as regard the future exercise of powers over those plots.
REP7-561	National Highways	Table 3 REP6-114 Document 8.4.14: Applicant's Comments on any Further Information or Submissions Received by Deadline 5 submitted by the Applicant for Deadline 6 and NH Response for Deadline 7 REP5-253, Book of Reference submitted at Deadline 4, 2.1 – 2.3, NH Response to Applicant's Comment: It is noted that to date, no communications have been received from the Applicant in relation to the 3 new plots added to the 4.3 Book of Reference [Revision E] at Deadline 4. Engagement is awaited. In addition, no NH plots appear to have been removed from the Book of Reference [REP6-043]. The Applicant's comments in relation to Class 1 rights in the "lands" paragraph of its preferred PP's is noted. Whilst this restriction is welcome, it is not sufficient on its own to ensure the safe operation of the public highway, because it would still allow the Applicant to exercise Compulsory Acquisition/Temporary Possession powers over the SRN, and over land in which NH has an interest falling within the other classes of land, without NH's consent. Instead, NH requires paragraph 20 to remain as per its standard PP's (see Appendix 1) and for the CA/TP articles to be referred to in Paragraph 7(2) of the PP's which provide a wider restriction against the Applicant using any powers of CA/TP without its consent.	The Applicant does not agree that engagement on these matters has not taken place. The Applicant and National Highways have engaged regularly throughout the Examination in relation to National Highways' land interests, including review of affected plots, de-trunked land and the rights sought by the Applicant. The Applicant notes National Highways' comments regarding the three plots added to **4.3 Book of Reference [Revision G]** and remains willing to discuss any specific concerns it may have in relation to those interests. The Applicant further notes that the continued inclusion of plots within the Book of Reference does not indicate that discussions have not progressed. The Applicant has undertaken a detailed review of National Highways' interests and, where appropriate, amendments have been made to the land documentation submitted during Examination. Discussions regarding the remaining plots and the extent of rights sought have continued alongside negotiations on the protective provisions and related protections within the draft DCO. In relation to National Highways' comment in respect of removal of NH plots in the book of reference, please see the row above.

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REP7-561	National Highways	*REP5-253, Compulsory Acquisition Is Not Necessary or Proportionate, 2.4 and 2.5, NH Response to Applicant's Comment*: NH maintains its position that the exercise of compulsory acquisition powers (including temporary possession) is not necessary or proportionate. There are existing statutory powers available to the Applicant via NRSWA, the Electricity Act and the DCO which enable the Applicant to undertake the works. NH relies on its submissions made to the CAH3 Hearing [REP6-154]. Please refer to our comments above in relation to Class 1 land take.	The Applicant has not yet reached agreement with National Highways as to the form of Protective Provisions to be included in Part 5 of Schedule 16 to the 3.1 Draft DCO [Revision H]. The substantive aspect of disagreement relates to the controls which National Highways is seeking to impose through those Protective Provisions on the Applicant's ability to rely upon powers of compulsory acquisition. As the following paragraphs explain, this disagreement stems from a difference of opinion as to whether it is necessary for the Applicant to seek a permanent easement over the strategic highway network in respect of overhead line apparatus to be constructed as part of the Project. NGET's position remains that permanent easements are required for any proposed overhead powerlines ("OHPL") oversailing the highway to avoid risk to the continued and secure operation of the transmission network. Indeed, the preference for permanent rights is made clear by the Department for Energy Security and Net Zero in National Policy Statement EN-5, paragraph 2.6.4 which states that in cases where an applicant does not succeed in reaching a voluntary agreement where the compulsory acquisition of rights is sought then: *"permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the important of the relevant infrastructure to the government's Clean Power and net zero goals".* The need for a permanent right is further reiterated in the Applicant's statement of reasons within section 6.4 of the document (more particularly paragraph 6.4.7). National Highways ("NH") seek to rely on NGET's statutory powers to install lines in the street under the Electricity Act 1989 read together with sections 84 and 85 of the New Roads and Street Works Act 1991 ("NRSWA") and the associated 1992 Code of Practice ("the CoP"[1]) on "Measures Necessary Where Apparatus is Affected by Major Works" to argue that such permanent easements are not necessary. Sections 84 and 85 NRSWA read together with the CoP establish a regime for managing the diversion of an undertaker's apparatus installed in the highway pursuant to a statutory right. Where an undertaker's apparatus in a street is or may be affected by major highway works, the highway authority and the undertaker must take such steps as are reasonably required to identify the measures needed, settle a specification and coordinate their implementation. Where a diversion is required, the allowable costs are shared under the Street Works (Sharing of Costs of Works) (England) Regulations 2000, with the highway authority typically bearing 82% of those costs and the undertaker the balance. The CoP sets out guiding principles as to how such coordination is to take place. However, there are several respects in which reliance on this regime alone could pose a risk to NGET's assets and would not provide equivalent protection to a permanent easement. First, the CoP is not itself legislation and remains capable of being repealed or revised. Indeed, the CoP is presently subject to a full review by HAUC(UK)'s Diversionary Works working group.[2] There is thus the possibility of changes to the CoP in the relatively near future. Accordingly, the CoP cannot be relied on as likely to be in place in its current form throughout the operational lifetime of NGET's assets. Second, where NH and NGET are unable to agree the measures required under section 84(1) NRSWA, the dispute is resolved not by any order preserving NGET's continued occupation but by arbitration under section 99 NRSWA, and the sanction for non-compliance with an arbitrator's decision is an award of damages rather than a mechanism securing continued occupation of the land. That is not by itself a guarantee that NGET's apparatus
REP7-561	National Highways	*REP5-253, NRSWA Provides Adequate Statutory Powers, Serious Detriment to the SRN and Relief Sought, 2.6 - 2.11, NH Response to Applicant's Comment*: In relation to the underground cable crossings, NH is prepared to grant an easement by consent. Accordingly, compulsory acquisition is not necessary. This is an agreed position with the Applicant. In relation to the overhead lines, NH has set out its position in CAH3 and its summary of Oral Submissions and Update Note [REP6-154]. NH's principal position has always been that the Applicant should use powers derived from NRSWA to undertake the works required for the overhead lines. NH does not accept the suggestion that it should be precluded from evolving its position and thinking in relation to the DCO. NH notes that despite assurances, NH is disappointed that no further meetings have taken place between NH and the Applicant since 18 June. NH's position remains as previously set out.	

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			will remain in place, nor that a replacement route will be available and operational, before the existing apparatus is required to be removed. Third, the CoP does not provide a blanket rule whereby some disruption to service would never be permissible (e.g. paras. 3.6 and 4.3). Accordingly, in some cases, the CoP and section 84(1) may support highway works commencing before a permanent diversion is fully in place. Fourth, sections 84 and 85 NRSWA and the CoP apply only to "major works", meaning works to a highway that includes a carriageway as defined in section 86(3) NRSWA, so that works falling outside that definition, including works to a footway, fall instead to be dealt with under the more limited protective regime in section 83 NRSWA. There is also a more fundamental question as to the territorial reach of NRSWA and the Electricity Act 1989 of particular relevance to NGET's overhead apparatus. By design, NGET's proposed OHPL in many instances would sit above the functional highway, in airspace that may extend beyond the zone of ordinary highway use. As explained in highways cases such as Southwark LBC v Transport for London [2018] UKSC 63, a crossing at height positioned outside the functional highway boundary and the zone of ordinary highway use may be regarded as falling outside the highway itself. NGET's view stated at Deadline 6[3] is that its OHPL apparatus would fall outside the scope of street works powers including under the NRSWA, the Electricity Act 1989 and Article 11 of the dDCO, in a manner analogous to apparatus laid at a depth beyond the zone of influence of the highway. While section 105 NRSWA defines being "in" a street as including apparatus "under, over, across, along or upon" it, NGET is not aware of any authority to support the proposition that this extends street works powers not just to above and below the surface of the street but also beyond the vertical plane that lies within the functional extent of the highway. This issue was considered recently by the Examining Authority ("ExA") in the Hynet Carbon Dioxide Pipeline DCO.[4] The applicant in Hynet considered that it could not rely on provisions of the NRSWA to place and maintain the pipeline in the subsoil because the pipeline would lie within part of the subsoil extending below the extent of the street rather than within the part comprised in the "street" itself (i.e. the applicant argued that the extent of the highway did not extend to the depth of the pipeline as that was beyond the slice of subsoil that fell within the zone of influence of the highway)[5] (see ExA's report at para. 8.7.395 ff.). NH disagreed. Having regard to legal submissions made by the applicant referring to Southwark, the ExA apparently accepted in accordance with the applicant's approach that NRSWA powers could not be relied upon for apparatus lying beneath the zone of influence of the highway, notwithstanding the wider wording of section 105 NRSWA. The ExA's conclusion on this point is at para. 8.7.408: *"Indeed, from the evidence submitted the ExA considers the Applicant has made a competent and compelling case that the relevant element of the development in the subsurface beneath both the SRN and local road network would not be street works, especially in the light of the case law highlighted and NH changing its position in regard to the Applicant not having statutory right to lay apparatus beneath the highway (in the same way as a statutory undertaker)"* Applying the ExA's approach in Hynet, NGET could not rely on statutory rights under NRSWA or the Electricity Act 1989 to have installed, or to continue to maintain, OHPL lying beyond the functional highways boundary (even leaving aside the problem of future

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			diversions for highways works addressed above). Article 11 of the dDCO is even more restricted. Securing permanent easements avoids that issue, by placing NGET's rights on a footing that does not depend on where the boundary of NRSWA's reach is ultimately found to lie. This position is also consistent with the Cambridge Wastewater Transfer and Treatment Development DCO, where again there was a dispute as to whether permanent land rights were justified in respect of the subsoil beneath the highway for the purposes of the tunnel. The nature of the works in that case was of course different to here, but a similar issue arose vis-à-vis the functional extent of the highway and street works powers. As explained at para. 6.5.89 of the ExA's Report,[6] the applicant considered that given the depth of the proposed wastewater transfer tunnel, NRSWA was not applicable (the works, the applicant argued, would not be "in" a street for the purposes of section 48(3) NRSWA). The applicant also considered that the scale, depth, permanency and lack of flexibility of the structure required permanent land rights (see paras. 6.5.92-6.5.93). While the basis for its conclusions were not explained in detail, the ExA having summarised this position concluded that the subsoil acquisition sought was justified (see paras. 6.5.96-6.5.97). Taking these matters together, NGET's position is that NRSWA and its associated CoP are not designed to, and do not, provide the degree of permanence necessary to secure the long-term security of the proposed nationally significant electricity transmission infrastructure. For oversailing apparatus above the highway, permanent easements are required, to avoid risk to the continued and secure operation of the transmission network.
REP7-561	National Highways	*REP5-253, Draft DCO submitted at Deadline 4, 3.1, NH Response to Applicant's Comment:* NH notes that, whilst the Applicant may have previously responded to NH's comments, the responses provided do not adequately address NH's concerns, and NH's concerns therefore remain outstanding as set out in NH's Deadline 6 Submission [REP6-155]. NH requires these points to be properly addressed. For ease of reference, NH's position is again set out above. It is noted that these points have not been addressed in the latest version of the dDCO [REP6-031].	The Applicant sets out its position in respect of the outstanding points on the protective provisions in the rows above as well as in the position statement for National Highways contained within the **8.7 Statutory Undertaker Tracker [Revision G]**.
REP7-561	National Highways	*REP5-253, Comments on latest Statutory Undertaker Tracker submitted at Deadline 4, 4.1, NH Response to Applicant's Comment:* The PP's contained in 3.1 Draft Development Consent Order [Revision F] [REP6-031] at Deadline 6 are not agreed. See Appendix 1. In addition, no NH plots appear to have been removed from the Book of Reference [REP6-043].	The Applicant sets out its position in respect of the outstanding points on the protective provisions in the rows above as well as in the position statement for National Highways contained within the **8.7 Statutory Undertaker Tracker [Revision G].**
REP7-561	National Highways	*Table 4 NH's comments on the Applicants response on responses to ExQ2: - TT2.2 and TT2.4* In productive discussions with the Applicant, National Highways has explained that it is broadly content with the logic behind the methodology which the Applicant has employed to determine the construction trip generation, distribution and assignment, but it has not yet had visibility of the detailed calculations that were made and therefore it is still not possible for NH to agree with the forecast traffic flows at SRN junctions, nor whether the proposed mitigation is appropriate. The Applicant has agreed to share the detailed shapefiles and spreadsheet calculations to enable an understanding of how the forecast traffic volumes have been derived and these are expected shortly. NH will review these as quickly as possible once they have been received.	The Applicant held a Trip Generation meeting with National Highways on 31 March 2026, where trip generation and the methodology were discussed in detail. In follow-up meetings with National Highways, the Applicant understood that the concerns were with the distribution and assignment of the construction trips, that culminate in the trips expected on the SRN junction. The Applicant provided National Highways' consultants with the requested underlying traffic flow information, trip distribution and assignment and a sample workbook on 28 July 2026. The Applicant has provided clarifications on any outstanding queries.

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REP7-561	National Highways	*Table 4 Table 4 NH's comments on the Applicants response on responses to ExQ2: - TT2.9* NH welcomes the Applicant's comments and requests that this the information is provided to all relevant Highways Authorities, including National Highways, not just the LHAs.	Section 8.2.1 of **7.3 Outline Construction Traffic Management Plan Appendix B - Outline Construction Worker Travel Plan [REP7-340]** sets out that the monitoring of travel will be reported in the quarterly report, and was amended to note that this information will be shared with National Highways. Section 5.4.21 of **7.3 Outline Construction Traffic Management Plan [Revision G]** was amended to note at National Highways will receive information, where appropriate, of predicted exceedances compared to the construction forecasts reported in **7.11 Transport Assessment [REP7-356]** and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310].**
REP7-561	National Highways	*Table 4 Table 4 NH's comments on the Applicants response on responses to ExQ2 TT2.10* National Highways welcomes the Applicant's Monitor and Manage approach in principle and has raised some comments in Section 7 this document.	The Applicant welcomes the agreement of the approach in principle and has provided a response in the rows below.
REP7-561	National Highways	*Traffic and Transport – Construction Impacts* At Deadline 6, NH reported that a number of matters relating to the impact of the proposed development on the SRN remained unresolved and that further information was anticipated from the Applicant. This position has not changed since Deadline 6, and this is reflected on the agreed SOCG which is expected to be submitted by the Applicant at Deadline 7. The following matters are unresolved to NH's satisfaction: (a) A Road Safety Audit (RASA) brief for the proposed changes at Copdock Roundabout (A14 Junction 55) has not yet been provided. The RSA1 must be completed and endorsed by NH before the proposals can be agreed. (b) WCHARs (or exemption notes) and GG104 Safety Assessments were provided to NH late on Friday 10 July and are being reviewed by NH. (c) The trip distribution/assignment for the construction traffic is yet to be fully understood and agreed, and therefore so is the modelling. As a consequence, there may be required mitigations that are not yet known. (d) Information regarding expected construction traffic flows at M25 J28, M25 J29 and M11 J8 was provided by the Applicant late on Friday 10 July and is being reviewed. Further information has been requested by AECOM (on behalf of NH) to enable to review to be completed. (e) NH are awaiting further information/ evidence of how additional trips at the A120 Galleys Corner junction have been calculated, so that this can be verified. In addition, further clarifications raised by AECOM (on behalf of NH) are outstanding with regard to traffic flows between the various junctions at/ around Galleys Corner. Once agreed, the VISSIM modelling can be undertaken. It is now unlikely that the modelling at this critical SRN location will be completed before the close of the Examination. (f) The modelling results for A12 Junction 25 have not yet been provided to NH so the impact at this location cannot be determined.	a) A Stage 1 Road Safety Audit (RSA) brief for the proposed changes at Copdock Roundabout (A14 Junction 55) will be issued by the close of the Examination to National Highways and Suffolk County Council for technical approval. It is noted that the RSA1 needs to be endorsed by National Highways (and SCC) before the proposals can be agreed. b) Noted. c) A meeting was held to discuss the trip generation and junction modelling with National Highways on 31 March 2026. Following the meeting, National Grid has provided National Highways with further clarification/detail on the trip generation, distribution and assignment, including traffic flow diagrams for its review on 28 July 2026. d) Noted. The Applicant provided a response to AECOM's further comments on 16 July 2026 which included an updated construction traffic flow profiles workbook. The updates are as follows: a spreadsheet has been updated to include the underlying calculations used to derive the flows and Movements per arm are provided in the AM and PM peak summary tabs, excluding free-flow movements. e) The Applicant submitted, on 16 July 2026, information requested by National Highways on the A120 Galleys Corner Junction and further details with regard to traffic flows between junctions to help with the VISSIM modelling being undertaken by National Highways. National Highways have requested further details relating to the committed developments, which the applicant will provide by the close of Examination f) The Applicant is currently undertaking the modelling for the A12 Junction 25. This will be shared with National Highways by early August 2026.
REP7-561	National Highways	*Construction Traffic Volumes* From NH's perspective, reliable and robust construction traffic forecasts are crucial to ensure the junction modelling is representative of the likely impacts at SRN junctions and enables the effectiveness of the proposed mitigation to be determined. Whilst National Highways is broadly content with the logic behind the methodology which the Applicant has employed to determine the construction trip generation, distribution and	The construction traffic forecasts have been derived using the methodology set out in the Construction Traffic Trip Generation and Distribution Methodology Note, which has been provided to National Highways and AECOM. This has been supplemented by technical discussions and the provision of a worked example spreadsheet to demonstrate how construction traffic has been assigned to the highway network and reflected in the junction models. The Applicant has provided National Highways with flow diagrams for construction

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		assignment, it has not yet had visibility of the detailed calculations that were undertaken. Therefore, it is still not possible for NH to agree with the forecast traffic flows at SRN junctions, nor whether the proposed mitigation is appropriate. The impact of construction traffic associated with the Norwich to Tilbury (N2T) project has been assessed by the Applicant at 16 junctions on the SRN using industry standard junction modelling software. Of these 16 junctions, the base year modelling undertaken by the Applicant has been fully agreed by NH for 14 of those junctions. For the two junctions where the base year modelling has not been agreed, please refer to paragraphs 6.10-6.12 below. For the 14 junctions where base modelling has been fully agreed, the future year modelling for these junctions has not yet been agreed by NH, as the methodology used to derive the construction vehicle demand matrices included within the models is not yet fully understood. In particular, further clarification is required on the relationship between the forecast construction vehicle demand across the project and the number of Heavy Goods Vehicles (HGV) assigned to each junction, as well as the methodology used to derive the turning movements allocated to construction traffic within the junction models. An additional junction, A12 was not modelled initially, but this is now being assessed (see Paragraph 6.13 below) NH has requested the detailed spreadsheet calculations (and shapefiles) from the Applicant to enable an understanding of how the forecast traffic volumes have been derived; however, these have not yet been provided. In view of the timescales for the closure of the Examination, NH proposes an alternative approach to dealing with the potential construction impacts at the identified sensitive SRN junctions. However, in the absence of agreed forecasts and mitigation measures, and given the constraints on time, NH has appended its analysis at Appendix 3, along with providing an explanation and required solution (set out in Paragraphs 6.8 to 6.13 below) so as to ensure that appropriate controls are in place to safeguard the safe and efficient operation of the SRN during the proposed development's four-year construction period. Given the time constraints, NH have not had the opportunity to discuss its proposed approach with the Applicant in advance of this submission. NH remain open to further discussions with the Applicant in this regard. [Applicant note: Appendix 3 has not been reproduced here and it dealt with separately below, see original in REP7-561]	traffic and committed development flows in addition to shapefiles for the SRN for review. The Applicant therefore considers that the forecast construction traffic volumes provide a robust basis for assessing and managing construction traffic impacts. Please refer to our response detailed above, in relation to the two base models that have not yet been approved.
REP7-561	National Highways	*Sensitive SRN Junctions Analysis* A review of the modelling results provided by the Applicant for the “Future Base + Committed Developments” scenario and the “Future Base + Committed Developments + N2T Construction Traffic” scenario has been undertaken to determine whether a junction could be considered to be “sensitive” to changes in the traffic demand. A junction has been considered to be “sensitive” if the reported Ratio of Flow to Capacity (RFC) is shown to be 0.85 or greater (for unsignalised junctions) or if the reported Degree of Saturation (DoS) is shown to be 90% or greater (for signalised junctions). These measures are generally accepted as the point at which a junction becomes congested and that safe operation becomes a concern. This assessment has only considered the arms and links of junctions that are part of the SRN. A comparison was then undertaken between the “Future Base + Committed Developments” scenario and the “Future Base + Committed Developments + N2T Construction Traffic” scenario to understand the impact that the proposed construction traffic (as forecast by the Applicant) would have on the operation of the 14 agreed SRN	Noted. The Applicant notes two junctions have not been fully agreed. For Site 46 (A12 Junction 26), the Applicant notes that National Highways has agreed to the build of the local junction model and geometry. The Applicant acknowledges National Highways’ concern that the traffic surveys were undertaken during a period when roadworks were present on the A12. However, further evidence has now been compiled and submitted to National Highways to demonstrate that the traffic flows surveyed at A12 Junction 26 were not materially affected by the A12 roadworks and remain robust and representative of typical traffic conditions. This evidence includes confirmation from the traffic survey provider that no abnormal traffic conditions or diversionary impacts were observed during the survey period. A review of the video survey footage has also been undertaken, which does not identify atypical traffic behaviour, disruption, or any indication that the junction was operating under materially abnormal conditions at the time of the survey. In addition, the surveyed A12 slip road flows have been reviewed against WebTRIS data for the relevant slip roads. For the A12 southbound / westbound slip road, the surveyed traffic

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		junction models. Based on the differences observed between these two scenarios, professional judgement was made as to whether mitigation is likely to be required at each of the junctions. This judgement has also been reviewed against the scope of mitigation proposed by the Applicant. There are two junctions for which the base model is not yet fully agreed. These are Site 46 and Site 48. In relation to Site 48, a commitment has been made by the Applicant to utilise a microsimulation model (VISSIM) to assess the impact of construction traffic at the A120 / Long Green / B11018 / Cressing Road (Galleys Corner) roundabout. The assessment of the impact of construction traffic at this junction will be determined following the junction modelling exercise, although this is not now expected until after the close of the Examination. In relation to Site 46, the geometry and build of the local junction model for Site 46 (A12 Junction 26) is agreed. However, there are concerns regarding the base year traffic flows used within the model. The traffic surveys were undertaken during a period of significant construction work on the A12 at and around A12 Junction 26 and, therefore, the volume of traffic using this junction at the time of the survey may not be representative of typical traffic conditions. As such, it is not yet possible to have confidence in the future year modelling results at this junction. In addition, following the cancellation of the A12 widening major project in October 25, which incorporated enhancements at A12 J25, the Applicant is currently assessing the proposed development's impacts at this location with a local junction model. The results of this exercise have not yet been provided to NH, and it is expected that agreement on the position at this junction is unlikely to be achieved before the close of the Examination.	flows on 17 October 2024 were 1,215 vehicles in the AM peak hour and 1,305 vehicles in the PM peak hour. For the A12 northbound / eastbound slip road, the surveyed flows were 368 vehicles in the AM peak hour and 523 vehicles in the PM peak hour. In both cases, the surveyed AM and PM peak hour flows fall within the typical average hourly variation shown by the WebTRIS data for the relevant slip roads. Further supporting analysis has also been undertaken using traffic re-surveys at Sites 38, 40 and 41, which are located on or adjacent to the A12 corridor. This comparison shows no material difference in peak-hour traffic flow profiles between the 2024 and 2025 survey datasets. This provides further evidence that any potential influence of A12 roadworks or diversions during the original survey period was not material. On this basis, the Applicant considers that the survey data used for Site 46 is suitable for the purposes of base model development and future year assessment. The Applicant therefore considers that there is sufficient evidence to demonstrate that A12 Junction 26 was not significantly affected by the A12 roadworks during the survey period, and that the associated modelling outputs can be relied upon when considering the potential impacts of N2T construction traffic. With regard to Site 48 (A120 / Long Green / B1018 / Cressing Road, Galleys Corner), the Applicant notes National Highways' comments and confirms that a commitment has been made to utilise a VISSIM microsimulation model to assess the impact of construction traffic at this junction. The assessment will be progressed in accordance with that commitment. In relation to A12 Junction 25, the Applicant notes National Highways' comments regarding the cancellation of the A12 widening scheme and confirms that the proposed development's impacts at this location are currently being assessed using a local junction model. The results of this assessment will be provided to National Highways once available. Overall, the Applicant considers that the additional evidence now provided in relation to Site 46 demonstrates that the underlying survey data is robust and representative, and therefore addresses National Highways' concern regarding the potential influence of A12 roadworks on the base year flows. The Applicant remains willing to discuss this evidence further with National Highways and AECOM if required.
REP7-561	National Highways	*Traffic Caps* The table in Appendix 3 summarises the findings of the above analysis, with the final column summarising NH's position regarding how traffic at each of the locations should be managed to ensure safe operation. In most cases, NH asserts that a cap on the volume of construction traffic, set at the level forecast by the Applicant, should be enforced. At these locations, the junctions have been adjudged by NH to not be sensitive, not require mitigation, or that the Applicant's proposed mitigation is sufficient - in all cases, for the level of additional traffic that is forecast. Therefore, it is appropriate to cap the construction traffic volumes at these levels. [Applicant note: Appendix 3 has not been reproduced here and it dealt with separately below, see original in REP7-561] In the following cases, either the proposed traffic cap approach is not appropriate, or further information is required at the present time before an approach can be agreed: • A47/Ipswich Road (Site 1) – this is adjudged to be a sensitive junction that requires mitigation. However, it is not possible to model the effectiveness of the proposed mitigation (additional signage). In the interests of taking a pragmatic approach that enables the construction to proceed, NH propose a strict "monitor and manage" regime at this junction with trigger for intervention before the junction becomes too congested.	The Applicant's final position on this matter is set out in the Traffic and Transport Section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**.

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		• A12 Junction 26 (Site 46), A12 Junction 29 (Site 38) and A120 Galley's Corner (Site 48) – no construction traffic should be allowed to use these junctions until further modelling is undertaken and mitigation agreed, if required. Following this, caps can be agreed. • A1089 Asda Roundabout (Site 89) and M25 Junction 30 (Site 90) are sensitive locations – NH awaits further information from the Applicant to enable a decision on whether construction traffic can be capped at the forecast levels or whether further modelling and/or mitigation is required. Until then, no construction traffic should be allowed to use these junctions.	
REP7-561	National Highways	*Outline Construction Traffic Management Plan* An updated Outline Construction Traffic Management Plan ("oCTMP") was submitted at Deadline 6 [REP6-082-. NH has reviewed the document and welcomes the inclusion of a "monitor and manage" approach to construction traffic. However, NH requires additional safeguards in view of the uncertainties surrounding the traffic flows and potential impacts (as described in Section 6 above), to ensure the continued safe operation of the SRN. In paragraph 5.4.20 of the oCTMP, it is stated that 'a cap on vehicle numbers is not considered necessary'. At this stage, this statement cannot be agreed by NH, for the reasons explained above. Additional junctions may need to be added to Table 5.10 of the oCTMP, depending on the outcome of the junction capacity modelling, including Galleys Corner (and surrounding junctions), A12 Junction 25 and A1089 Asda Roundabout	The Applicant has provided a response to the "monitor and manage" approach above. 5.4.20: The Applicant has provided a response on the vehicle caps in response to TT2.10 in **8.4.15 Applicant's Comments on Responses to EQ2 [REP 6-115]**. **7.3 Outline Construction Traffic Management Plan [Revision G]** had been updated at Deadline 4 to incorporate additional controls to monitor construction vehicle numbers against those assessed in 7**.11 Transport Assessment [REP7-356]** and **6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects [REP7-310]**. The Applicant considers that these measures represent a proportionate and robust approach, offering both the Local Highway Authority and local communities' confidence that construction traffic will remain within assessed levels.
REP7-561	National Highways	NH notes that in paragraph 6.2.7 of the oCTMP, there is an "s" missing from "National Highways".	This has been corrected and updated within **7.3 Outline Construction Traffic Management Plan [Revision G]**.
REP7-561	National Highways	NH considers that reporting on a quarterly basis is insufficiently frequent and that reporting should be undertaken on a monthly basis due to the uncertainty surrounding forecast traffic flows and impacts on SRN junctions as described in Section 6 above.	The Applicant provided additional detail on the booking system in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The three-month look-ahead will be provided within the quarterly report. However, any precited instances of exceedance of the numbers against those in **7.11 Transport Assessment [REP7-356]** and **6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects [REP7-310]** will be explained and discussed with the relevant local highway authorities and National Highways, where appropriate, not waiting for the quarterly report.
REP7-561	National Highways	In paragraph 6.3.1 of the oCTMP, the process for implementing corrective actions should there be an incidence of non-compliance with the CTMP involves consultation with the relevant highway authority. NH welcomes the inclusion of this process in the oCTMP but considers that this does not go far enough in view of the concerns with the trip generation and distribution/assignment methodology and traffic modelling. To ensure that the traffic volume caps (as proposed in Appendix 3 and described above) are managed effectively at the sensitive SRN junctions and that appropriate mitigation measures are implemented if required, these measures need to be agreed with NH. Further, NH requires that timescales are specified for the completion of each stage. These need to be reasonable from the contractor's perspective but also need to recognise the need for pace and agility to address safety concerns on the highway network.	The indicative timescales for corrective actions are: • Stage 1: within 72 hours to review data and concerns, with a warning actioned within the week. • Stage 2: The warning and action plan within a week of the breach. • Stage three: Formal warning within a week, removal would be within 24 hours for a repeat offender following two previous strikes. The timescales are currently indicative and in more serious cases, the timescale may take longer than the indicative period noted. The Applicant and the Main Works Contractor(s) will include the indicative timescales within the final CTMP.
REP7-561	National Highways	Section 6.4.1 (final bullet point) states that 'Construction HGV movements above those included within the Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects	The Applicant has included the three-month look-ahead in the enforcement section of **7.3 Outline Construction Traffic Management Plan [Revision G]** to provide additional emphasis on the importance of vehicle monitoring. The Main Works Contractor(s) is

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		(document reference 6.16.A4) to be reported within the three month look ahead' would be reported as a non-compliance. This is welcomed by NH. However, reference should also be made in this section to vehicle caps and monitoring.	committed to the monitoring and reporting of the three-month look ahead, in Section 5.4.20, which is secured through requirement 4 of Schedule 3 of **3.1 Draft DCO [Revision H]**. As a result, the commitment is not repeated in Section 6.4.1.
REP7-561	National Highways	Further, Requirement 4 (1) in the DCO, states that the final CTMP (b) must be approved by the local planning authority. Whilst it is expected that NH would be consulted on this as per usual practice, this does not provide NH sufficient control over the safe operation of the SRN, given the construction traffic forecasts and potential impact on sensitive junctions is not agreed and is unlikely to be agreed by the close of the Examination. Accordingly, the following wording in red should be included in Requirement 4(1)" so that Requirement 4(1) reads: - [Applicant note: the IP provides a summary of the changes that NH are seeking which are not reproduced here, see original in REP7-561] This will provide NH with the necessary assurance that appropriate caps are in place at sensitive junctions and documented in the CTMP, that the modelling of A120 Galley's Corner and its environs and at the A12 Junction 25 has been completed and any mitigation measures required are agreed, that the outstanding issues at A12 Junction 26, A123 Junction 29, M25 Junction 30 and the A1089 Asda Roundabout are resolved, and that the processes for monitoring and managing the traffic, and, critically, for implementing corrective measures, are sufficiently robust. NH considers that this is necessary due to the outstanding concerns it has over the forecast construction traffic flows and modelling. However, this is intended to provide a pragmatic and proportionate solution that would enable NH to withdraw a number of its significant objections to the proposed DCO.	The Applicant notes National Highways' comments regarding the proposed amendment to Requirement 4(1) and the assurance sought in relation to caps, further modelling, mitigation, monitoring and corrective measures. The Applicant agrees that construction traffic should be appropriately monitored and managed through the CTMP, and that the CTMP is the correct mechanism for securing practical construction traffic controls. The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision G]** to include a three-month look-ahead process for construction vehicle trips, comparison against the construction traffic forecasts reported in 7.11 Transport Assessment [REP7-356] and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310]**, and notification to National Highways where appropriate where a potential exceedance is identified. **7.3 Outline Construction Traffic Management Plan [Revision G]** also identifies forecast exceedance as a matter of non-compliance to be investigated, with corrective measures considered where required. The Applicant does not agree that National Highways should be an approval body for the CTMP through Requirement 4(1). The CTMP will be approved by the relevant planning authority, with consultation with National Highways where matters affect the SRN. This provides an appropriate and proportionate mechanism for National Highways input, while maintaining the established discharge process for Requirements. With regard to the specific matters identified by National Highways, the Applicant's position is as follows: • A120 Galleys Corner and its environs: the Applicant has committed to assessment using a VISSIM microsimulation model. The outputs of that assessment will inform any further mitigation or traffic management measures that may be required, and the Applicant will continue to engage with National Highways and AECOM on the assessment and any resulting measures. • A12 Junction 25: the Applicant is undertaking local junction modelling following the cancellation of the A12 widening scheme. The results will be shared with National Highways once available, and any required mitigation or management measures can then be discussed. • A12 Junction 26: the Applicant has prepared additional evidence to demonstrate that the base year survey data was not materially affected by the A12 roadworks and remains robust and representative. This includes confirmation from the traffic survey provider, review of video footage, comparison of surveyed slip road flows with WebTRIS data, and comparison with re-surveys at other A12 corridor sites. • A12 Junction 29, M25 Junction 30 and A1089 Asda Roundabout: the Applicant will continue to engage with National Highways and AECOM on any further information required and on the appropriate form of proportionate monitoring, management or mitigation controls where justified by the assessment. The Applicant considers that the CTMP, as secured through Requirement 4, provides a robust and proportionate framework for monitoring and managing construction traffic impacts on the SRN. This includes forward planning through the three-month look-ahead, reporting of forecast exceedances, investigation of non-compliance, and implementation of

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			corrective measures where required. The Applicant therefore considers that the additional approval role sought by National Highways is not necessary, and that National Highways' interests can be appropriately addressed through consultation and continued technical engagement. The Applicant remains committed to working with National Highways and AECOM to agree the detailed monitoring arrangements, trigger levels and corrective measures where these are required for sensitive SRN junctions.
REP7-561	National Highways	*Appendix 3 Norwich to tilbury – Sensitive SRN Junctions Analysis and proposed construction traffic caps* The IP provides National Highways analysis along with an explanation and solution that National Highways are seeking for Sites 1, 12, 21, 26, 29, 36, 38, 39, 40, 46, 47, 48, 56, 62, 89, and 90.	The Applicant notes National Highways' analysis of the identified sensitive SRN junctions and the proposed construction traffic controls associated with Sites 1, 12, 21, 26, 29, 36, 38, 39, 40, 46, 47, 48, 56, 62, 89 and 90. The Applicant has continued to engage with National Highways and AECOM through a series of technical meetings and has provided additional information relating to construction traffic forecasting, assignment methodology, routeing assumptions, traffic flow profiles and junction modelling to support review of the assessment. The Applicant agrees that appropriate controls should be in place to manage construction traffic at sensitive SRN locations. However, the Applicant considers that mitigation should remain proportionate and evidence-led, recognising the temporary nature of construction traffic impacts and ongoing work to refine and review modelling assumptions and mitigation requirements. Discussions have progressed regarding the use of CTMP-based monitoring and management measures at sensitive locations, including agreed monitoring arrangements, trigger levels and corrective actions where appropriate. The Applicant considers that this provides a robust mechanism for identifying and managing any unforeseen impacts during construction. The Applicant notes that some locations remain subject to ongoing technical review. This includes continued engagement with National Highways and AECOM regarding construction traffic assignment, traffic distribution assumptions, and the review of SRN junction performance. Additional information has been supplied to support review of locations including M11 Junction 8 and M25 Junctions 28, 29 and 30. At A120 Galleys Corner (Site 48), updated modelling information has been provided following correction of a construction traffic assignment input issue and discussions are now focused on verification, monitoring and mitigation requirements. These matters are capable of resolution through ongoing technical engagement and the CTMP framework. Accordingly, the Applicant considers that the remaining matters relate principally to the form of monitoring, management and mitigation measures, rather than any fundamental disagreement regarding the overall assessment methodology or the acceptability of the Project's construction traffic impacts. The Applicant will continue to engage with National Highways and AECOM to agree any required controls, monitoring triggers and mitigation measures through the CTMP and associated approval processes, as per **5.9.20 signed Statement of Common Ground – National Highways [REP7-130]**.
REP7-566	North-West and South-West of Chelmsford Parishes Group	Comments on Applicant's Comments on any Further Information or Submissions received by Deadline 5 [**REP6-114**]. *Applicant's Use of 'Finer Grain' Landscape Assessments* 5. The Applicant used the Essex County Landscape Assessment (LCA B1 and LCA G2) to reach its judgements. The Chelmsford LCA and more local assessment associated with the Broomfield Neighbourhood Plan (NP) are finer grain and provide	The Applicant does not agree that it failed to consider finer-grained landscape evidence or that local landscape assessments were disregarded in reaching the LVIA conclusions. The Applicant has noted previously that desk top studies supporting the LVIA have included local sources of baseline information such as the neighbourhood plans and LCAs. These are identified in the Environmental Statement. Comprehensive site survey work has also informed judgements. The Applicant also referred to studies prepared by Alison Farmer, which have been signposted by the Parishes Group, and a recent response to this is provided at Deadline 7 in **8.4.16 Applicant's Comments on any Further Information or**

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		further information on the value and sensitivity of the landscape. The Applicant does not appear to have adjusted its judgements based on these finer grain assessments and evidence. This is despite its statement that 'the Applicant is able to draw its own conclusions about value and susceptibility' from a range of evidence. If reference was indeed made to these more detailed assessments showing higher value ratings, then the Applicant must have consciously concluded that they indicated no increased value or sensitivity. This is contrary to the evidence. The Parishes Group does not dispute that the Applicant has previously included reference to Neighbourhood Plans in APP-085 and REP4-185. However, the Group's point is that the Applicant did not use the landscape assessments which underpinned the NP nor did it include these assessments in its document lists, which tends to confirm the Group's point. The Applicant does not attempt to rebut this criticism and its continued reference to the same documents, APP-085 and REP4-185, suggests it is seeking to avoid this point.	**Submissions Received by Deadline 6 [REP7-481]**. The Applicant notes the specific reference to the Chelmsford LCA. The Preliminary Environmental Information Report published in 2024 and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [REP7-260]** both confirm that the baseline information was informed by a desk study drawing on information which includes the Braintree, Brentwood, Chelmsford, Maldon and Uttlesford LCAs (CBA, 2006). Since local landscape evidence has already been taken into consideration, adjustments are not considered necessary; however, the Applicant has considered any new information put forward, and remains satisfied that no changes are required, and the level of significant effects identified would remain as reported in the LVIA. Judgements in the LVIA are relative to all landscapes considered within the context of the Project study area, not just one localised area, and may therefore differ from a local study which focuses on a smaller landscape area. The LVIA was required to apply a consistent methodology across the entire Project corridor and assess effects relative to the wider study area. Accordingly, professional judgements on value, susceptibility and significance may reasonably differ from those contained within more localised studies. The approach provides a level of consistency required for a study of this scale, which is subject to rigorous examination as part of the Development Consent Order process. The assessment identifies significant effects within 1.5km of the alignment in the Chelmsford area, with the exception of the more urban Chelmsford and Environs LCA which identifies significant effects within 0.5km of the Project alignment. Beyond 0.5km, the built development within the character area filters views towards the Project, reducing the impact on landscape character. The Applicant has reviewed the local landscape evidence referred to by the Parishes Group and remains satisfied that the assessment appropriately reflects the characteristics, value and sensitivity of the affected landscapes. Significant effects have been identified where justified by the evidence, including within the Chelmsford area. The Applicant does not consider that the additional evidence presented alters the assessment conclusions or requires any amendment to the LVIA. Accordingly, the Applicant maintains that the landscape assessment is robust, proportionate and evidence-based, and that no adjustment to the reported judgements is necessary.
REP7-566	North-West and South-West of Chelmsford Parishes Group	*Valued Landscape west of Broomfield* 6. The Applicant and the Parishes Group are both in agreement that significant adverse effects extend beyond 500m from the proposed OHL in the area west of Broomfield. The Valued Landscape lies within this area (see annotated plan below). Given this, it can be concluded that the proposed development would indeed adversely affect the Valued Landscape west of Broomfield. However, this conclusion is not explicitly acknowledged by the Applicant. 7. Further, the Applicant has concluded a landscape value of low-medium adjacent to the area of Broomfield just over 1km from the proposals. However, the more detailed assessments of this area (such as the NP assessments referred to above) demonstrate that it has greater value and therefore higher sensitivity. Therefore, the Group holds that, even with this greater distance, the effects of the OHL on the area adjacent to Broomfield village would be significant adverse. The Applicant already agrees that sensitivity is moderate to high in LCA G2 – this does not suddenly cease at a line 1km from the OHL. The Applicant states that 'there will be no direct landscape effects, such as loss or changes to landscape features …. within the Valued Landscape …'. However, this is to miss the point - indirect effects also give rise to significant adverse effects.	The Applicant has responded to the Parishes Group's comments relating to the valued landscape area to the west of Broomfield in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]** and has noted that moderate and significant effects are anticipated within 0.5km and 1km of the alignment. The valued landscape, as identified in Broomfield Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views (Alison Farmer Associates, 2021) occupies a part of this area to the east of the Saffron Trail. The remainder of the valued landscape, beyond approximately 1km to the east of the Project alignment, is anticipated to experience minor effects near Broomfield and where the church lies. The report notes that the valued landscape is set amongst arable fields bound by hedgerows with mature hedgerow trees, on a low ridge to the west of Broomfield. The area is locally valued for its tranquillity and quietness, with PRoW and an absence of roads, and forms a shallow bowl around the nearby church and conservation area. The edge of Broomfield settlement lies to the east of the valued landscape area. To the west, outside of the valued landscape and in the area where the Project has been sited, the report notes that '*the landscape becomes more of a plateau with views to the north, south and west away from Broomfield. Whilst still attractive and intact farmland, this landscape lacks the distinction provided by the landmark features and variation in smaller scale enclosures evident further east*.' The Applicant notes the Parishes Group's comment whilst respecting that different assessors may reach different

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			judgements, as noted in GLVIA3. The Applicant remains comfortable with the judgements made in the LVIA and the reasoning given. The Applicant is in agreement with the Parishes Group that there is a transition from one level of effect to another (e.g., major to moderate, moderate to minor), rather than an absolute and abrupt change. This is reflected in the guidance provided in GLVIA3, and the use of categories such as low-medium, or minor-moderate when making judgements about value or levels of effect. The transition will vary according to individual factors, such as whether there is screening from landscape features, such as layers of hedgerows with mature trees, in part of the LCA, or a change in topography that leads to more screening, or a transition towards a change in character from rural to urban edge. All of these apply in this situation, with filtering from vegetation and a change in topography resulting in a lessening of effects to the east, as noted in the LVIA. As noted above, the Applicant has identified significant effects in areas where there are no direct effects, indicating an agreement with the Parishes Group that indirect effects can give rise to significant effects., whilst noting that there are no direct losses of landscape features. The Applicant would consider this to be part of a transparent approach to assessment.
REP7-566	North-West and South-West of Chelmsford Parishes Group	Comparison of the Preferred Route with the east and south of Chelmsford alternative 1. The Parishes Group holds that landscape matters considered by the Applicant at the preferred route alignment stage, as presented in the CPRSS Appendices [REP1-068], do not constitute a sufficiently detailed and robust assessment of the eastern and southern alternative route and its relative merits compared to the Preferred Route. During the course of the Examination to date, the Applicant has not presented any further evidence or additional assessments for its original conclusions. It simply states (including in this comment on our REP5-260) that providing further detail is unnecessary and that the alternative route has been carefully considered and constraints documented. The Group understands this is the Applicant's position but simply re-stating it is not the same as presenting detailed transparent evidence to support or justify it. This matters because of the number of residual significant adverse landscape and visual effects which arise as a result of the western Preferred Route. The Group therefore concludes that no secure justification for the western Preferred Route or robust comparison with relevant alternatives have been set before the ExA.	As stated in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114],** the Applicant does not consider that providing further detail is necessary, given that its position is that this alternative has been carefully considered and is less preferred because of constraints. These constraints have been documented through the documentation produced in support of the consultations and we see no purpose to identifying parts where the route is possible when this is not being taken forwards.
REP7-565	**Norfolk County Council**	New sub-paragraph 1(1) of Schedule 4 (discharge of requirements) inserts language which would allow the applicant to decide whether to submit a requirement for approval to either the relevant planning authority or the DESNZ unit. NCC considers the ability for the undertaker to choose their venue to be inappropriate. Instead, NCC prefers the approach proposed by Suffolk County Council, in which applications for discharge of requirement may be 'called in' by the secretary of state, either on her own initiative or by invitation. As a minor drafting point, NCC invite the applicant and the ExA to consider whether, in the case where the DESNZ unit will manage the application, the discharging authority should more properly be the secretary of state rather than "the DESNZ unit". Paragraph 3 of Schedule 4 has been changed to reflect the recent applicability of the Infrastructure Planning (Fees) Regulations 2010 to local authorities. NCC considers that the structure of 3(1)(a) and 3(1)(b) needs to be re-examined. It appears that (a) provides for either paying the fee due under the Infrastructure Planning (Fees) Regulations 2010, or where no such fee may be charged, the fee prescribed under the Town and Country Planning Act 1990. However, the requirement is to pay either (a) or (b), which is £298,	The Applicant's proposed approach to the DESNZ unit is set out in detail in Appendix A (Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury) to its 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] and is addressed further at [section 8.12] in 8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement. The Applicant does not accept SCC's (as reiterated by NCC here) proposed modifications and maintains its position as set out in those documents and summarised at a high level as follows: SCC's (as reiterated by NCC) proposed call-in model would constrain how the unit can operate before it is established. The Government has accepted Recommendation 30 of the Fingleton Review and committed to establishing the DESNZ unit to "speed up decisions on the meeting of post-consent requirements". The Applicant's drafting gives the undertaker a case-by-case election because the unit's operational framework has not yet been published. The relevant local

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		apparently without any preference for (a) or, if a hierarchy is intended, any definition of the circumstances in which (b) should be paid instead of either option in (a). NCC would request that the applicant consider whether what is intended is that the preference is for the appropriate fee to be paid under the Infrastructure Planning (Fees) Regulations 2010, but if there is no such fee for the fee prescribed for discharge of conditions under the 1990 Act is paid, and only if (for some reason) that cannot be the fee, the payment should be £298. It is not clear to NCC under what circumstances it would be more appropriate to pay £298 rather than the fee under either of the enactments mentioned, but if the applicant does forsee such circumstances, they should be set out explicitly.	planning authority is a consultee in every case where the unit acts, preserving local expertise and community accountability, with drafting providing for cost recovery. It is not necessary to replace DESNZ unit with the Secretary of State as the DESNZ unit is defined in article 1 of the **3.1 Draft DCO [Revision H]** as follows: *""DESNZ unit" means a group or body set up by or on behalf of the Secretary of State for the purpose of providing any consent, agreement or approval required by requirements contained in development consent orders including the requirements in this Order"*. In relation to fees, please refer to paragraph 4.4.6 of the 3.2 Explanatory Memorandum [Revision H] which explains that: "Paragraph 3 provides for the payment of fees where an application is made for the one or more consent, agreement or approval required by a requirement, except where the relevant authority is the DESNZ unit. Unless a bespoke agreement is made and legally secured (for example a planning performance agreement) the fee must be the prescribed fee under either the Infrastructure Planning (Fees) Regulations 2010 or, where no fee may be charged under those regulations, the prescribed fee under the 1990 Act for the discharge of planning conditions. In the absence of a prescribed fee, the fee is £298 for each application.". An authority who wishes to charge fees under the Infrastructure Planning (Fees) Regulations 2010 must have published a schedule of its charges. The potential for an authority not to have such a schedule is the reason behind the 1990 Act prescribed fee being the fall-back position. In the event of there being an application to which neither of these prescribed fees would be applicable, the fall-back position would be a fee of £298.
REP7-565	Norfolk County Council	[*REP6-073] Outline Code of Construction Practice (Tracked) (Final Issue F)* Paragraph 6.1.16 has been edited to provide that revision C of the Drainage Strategy will be used as a basis of surface water management plans. NCC would like to highlight that we consider the Drainage Strategy to be wholly unsuitable as a basis for more detailed management plans due to the lack of evidence underpinning the approach taken by the applicant. NCC's concerns have been set out in the appendix to our responses to ExQ2 [REP5-257] and at item 9 of our ISH4 post-hearing submission [REP6-158]. NCC supports the changes made in section 7.3 (Ecology and Landscape Working Group) which expand the role of the ecology working group to include landscape matters. It will be important for the success of landscape mitigation and compensation measures for there to be a venue to consider their progress on an ongoing basis.	The Applicant has previously provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]**. The Applicant's and Norfolk County Council LLFA's positions are set out in the signed statement of common ground with Norfolk County Council (**5.9.1 Signed Statement of Common Ground - Norfolk County Council (LLFA and Highways) [REP7-094]**). The Applicant has engaged with the LLFA on a number of matters, however, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore this matter is recorded as 'Not Agreed'. The Applicant considers **8.2 Drainage Strategy [REP7-375]** to be proportionate for the nature and scale of the Project and has considered the requirements of all relevant statutory undertakers in developing the strategy. The Applicants' final position on this matter is set out in the Water Environment Section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**. The Applicant welcomes Norfolk County Council's support of the proposed Ecology and Landscape Working Group.
REP7-565	Norfolk County Council	*[REP6-096] Drainage Strategy DCO (Tracked) (Final Issue C)* The changes introduced in revision C do not address the fundamental issues we have with the drainage strategy. NCC's concerns about the drainage strategy have been set out in the appendix to our responses to ExQ2 [REP5-257] and at item 9 of our ISH4 post-hearing submission [REP6-158].	The Applicant and Norfolk County Council LLFA positions are set out in **5.9.1 Signed Statement of Common Ground - Norfolk County Council (LLFA and Highways) [REP7-094]**. The Applicant has engaged with the LLFA on a number of matters, however, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore this matter is recorded as 'Not Agreed'. The Applicant considers **8.2 Drainage Strategy [REP7-375]** to be proportionate for the nature and scale of the Project and has considered the requirements of all relevant statutory undertakers in developing the strategy. The Applicants final position on this matter is set out in the Water Environment Section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**.

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REP7-565	Norfolk County Council	*[REP6-118] Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 (Final Issue A)* At Annex A of the applicant's written summary of oral submissions, the applicant has provided the draft text for a schedule to the DCO which would secure the provision of landscape compensation measures at a number of locations including the Waveney Valley. For reasons set out in detail in [RR-2754], [REP1-173] and [REP5-256], NCC consider that landscape compensation is required for the Waveney Valley due to the policy requirements of EN-1 and the major significant adverse effects on the highly valuable and susceptible Waveney Valley. NCC is broadly content with the mechanism proposed by the applicant we consider that it is capable of meeting the tests in 4.1.16 and 4.1.18 of EN-1 (2024). NCC and Suffolk County Council have jointly submitted some suggested drafting amendments for schedule 20 to the applicant. In general, these relate to practical issues with the way relevant authorities are defined, how monies are handled and accounted for, and how the "unspent contributions" mechanism works. We have made suggestions for how to define areas in column (1), suggested the relevant authorities to be listed in column (2) and provided our preferred figures for inclusion in column (3). We understand that the version of schedule 20 submitted by the applicant at this deadline (deadline 7) will take account of our suggestions.	The Applicant notes Norfolk County Council's comments and has welcomed the positive engagement on this matter which has taken place. The Applicant can confirm that the revisions to the drafting suggested by the LPAs received in advance on Deadline 7 were incorporated into the Deadline 7 drafting of Schedule 20 in **3.1 Draft DCO [Revision H]**.
REP7-567	Offton and Willisham Parish Council	We refer to a letter to the Inspectorate of 7 July 2026, from Sir Bernard Jenkin MP for Harwich and North Essex. The points made by Sir Bernard regarding the impact on his constituency, specifically the Colne Valley, which adjoins Dedham Vale AONB, can be applied to Offton and Willisham, and surrounding villages in Suffolk. National Grid (the applicant) have themselves stated that Offton is as severely affected as Dedham by the plans for 50m pylons and associated undergrounding of low voltage Power Networks distribution cables. Sir Bernard points out, as have we and all members of the campaign, that the Holford Rules, while not part of planning law, remain the best practice framework, which is expected to apply to decisions about overhead powerlines. It is possible that if that policy had been properly applied, the route would not have impacted upon the Offton/Mid Suffolk area at all or at least would have been undergrounded. The Project therefore fails the fundamental policy test and is not capable of approval. Overhead lines are not an appropriate solution for East Anglia as a whole, and harm to the Offton/Mid Suffolk area within the wider compass of the route can be avoided by upgrading the existing grid using high temperature, low-sag converters, an offshore solution or HVDC undergrounding for the entire Norwich to Tilbury route. None of these alternatives have been put forward by the applicant. NESO's East Anglia Network Study, and Pylons East Anglia's analysis, tell us that HVDC undergrounding is feasible, and Richard Buxton points out that the applicant has not refuted this with any substantial evidence. NESO found it broadly comparable in costs to the overhead line option for the whole route between Norwich to Tilbury, if lifetime costs are included in the business case as they should be. We will not repeat the full text of Sir Bernard's letter but agree with his conclusion; "*the enormous harm caused to the… entire region, by the proposed overhead lines could be avoided through a grid upgrade using high-capacity conductors, offshore coordination or HVDC undergrounding. Given the harms of the Applicant's proposed*	The Applicant has responded to the letter from Sir Bernard Jenkin in **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP7-482]** and refers Offton and Willisham Parish Council to that response.

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		transmission solution and the benefits of the alternatives, the Secretary of State cannot approve this Development Consent Order."	
REP7-586	Penny Lang	Regarding the Applicant's (NG) response re: Colne Valley: Doc 8.5.8 SIH 2, REP5-307, I find it inadequate. I will not repeat all that I've said before but will say that just because NG repeats all their earlier comments, does not make them any more right. Which, in effect, is all that they keep doing, repeating that they are right. I do not wish to continue a kindergarten squabble. But if this "discussion" were to be face to face, NG would be simply repetitive, obdurate and obfuscatory. If they had responded appropriately and thoughtfully, we would obviously not have to waste our time continually pushing for proper answers. It is absolutely not sufficient for NG "to disagree with this position" and note that should the ExA require more information than has been provided, this request July can be made of the Applicant. NG should not have to be forced by ExA to give a considered answer to an IP. The Inspectors have requested substantive answers, not just document references, and I would expect IPs to be accorded the same respect by NG. I would repeat the core of just one of my objections, which is as follows: Through flawed judgement, NG has failed to prove that N2T will cause minimum harm to the Colne Valley. As stated before, the considered opinions of three separate, independent landscape reports have made clear that "the project would cause widespread significant adverse effects to the Colne Valley".	The Applicant is grateful to all those who have engaged with the consultation and examination processes and takes the concerns raised about its approach seriously. The Applicant welcomes the opportunity to respond to those concerns. The Applicant does not accept the suggestion that it has sought to obscure information or avoid engagement with substantive issues. Throughout the development of the Project and during the Examination, the Applicant has provided extensive consultation, technical and environmental information to explain the Project, the alternatives considered, and the reasons underpinning the decisions taken. While stakeholders may disagree with some of those decisions or the conclusions reached, the Applicant's objective has consistently been to provide sufficient information to enable informed participation in the process and to engage constructively with the issues raised. The Applicant provided detailed responses with regards to the Colne Valley in Section 5.2 of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**.
REP7-586	Penny Lang	With its usual economy of information, in response to Bullet Points 1-6, 8 & 10, "The Applicant stands by the statement made in …" and in each reply, a vast number of various document references follow. In other words, it is not responding effectively to the specific questions posed by PEA at ISH2. Some responses, shown below, have very limited answers. The Inspectors have requested substantive answers, not just repetition and document references, and NG should respond the same way to IPs At Bullet Point 1, the Applicant denies saying the route is straight at that point. Is that correct? At Bullet Point 6, the Applicant states that: "Pylons … will not obstruct views as these lattice structures are designed to be visually permeable". That is incorrect, they do obstruct views and settings At Bullet Point 8 "The Applicant has sought to minimise the need for vegetation removal and will replace vegetation except in circumstances where there are restrictions to planting trees under overhead lines and over underground cables. Although some woodland loss will occur …" "Will reduce tree removal 'as far as practicable'" This is far from reassuring. As with many of NG's statements, short on accurate and complete detail, with many unknowns. At Bullet Point 9, "the Applicant has assessed the risks of flooding … Environment Agency flood model outputs confirm that the location is not at risk of routine flooding from the Colne. It is therefore likely that the observed conditions link to poor draining and waterlogged soil conditions". Incorrect, as stated by locals who know the area, as the position of pylon TB050 is flooded, on water meadow near the river, every year.	Regarding Bullet Point 1, as set out in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, the Applicant previously explained that the Project has aimed to follow the most direct route avoiding the use of too many angle towers in line with Holford Rule 2. Changes in direction are proposed taking into consideration Holford Rule 3 where the Project has sought to avoid areas of high amenity value such as Fordstreet Conservation Area and the listed churches at Fordham and Aldham. The Applicant did not state that the route was straight in the response provided to PEA as set out in Appendix D of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**. Regarding Bullet Point 6, the Applicant considers lattice pylons to be visually permeable structures that do not obstruct or block views. This is because they are not a solid mass. Their open lattice steelwork restricts their mass, allowing the sky or landform and landcover beyond to be seen though them. This enables lattice pylons to disappear more readily into the distance and blend with backcloth of the sky and landcover. Pylons are also spaced apart, with gaps between them typically around 350 m. The conductors (overhead lines) between the pylons, also do not restrict views. Regarding Bullet Point, 8 the Applicant would like to reassure the IP that the assessment of vegetation loss presented within the Environmental Statement reflects a precautionary worse-case scenario. Following the detailed design stage, the final extent of any removal will be confirmed and further opportunities to avoid or reduce impacts to woodlands and mature trees will be implemented as far as practicable, to reduce the environmental impact of the Project and minimise the amount of replanting needed. Further details on the impacts to trees and woodlands and reinstatement planting needed, will be submitted to the local planning authorities as secured through Requirement 8 and 9 of **3.1 Draft DCO [Revision H].** Regarding Bullet Point 9, Pylon TB50 is situated approximately 105 m from the River Colne channel and is not therefore situated within its immediate riparian corridor, nor within the Environment Agency mapped flood extents. However, the Applicant acknowledges in its assessments that construction will take place in some areas of land that are prone to

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			waterlogging and have a higher risk of flooding and has secured robust management measures and mitigations for such sites, as detailed in **7.2 Outline Code of Construction Practice [Revision H]**. These would be adopted at the TB50 worksite if such conditions are encountered and this will ensure that the Project is resilient to flooding and that there would be no contribution towards increasing flood risk on neighbouring land. Accordingly, the Applicant remains satisfied that the effects on vegetation and flood risk have been appropriately assessed, and that suitable mitigation and management measures are secured through the DCO.
REP7-568	Pylons East Anglia	We note that Anglian Water has required a Water Resources Agreement (WRA) from the Applicant. We are still unable to find this WRA in the document library. We have been unable to find any estimate of the amount of water required by the Applicant for the N2T project. Without an WRA it is not possible for the ExA to determine that the Project: i. Does not compromise the supply of water for domestic purposes in breach of the Water Industry Act 1991; ii. Does not harm aquifers or water courses due to regional or cumulative over-abstraction of water for the project, in breach of the Water Framework Directive. iii. Has significant adverse effects on water (whether "direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating" those effects (Para 4.3.3 NPS EN-1). Para 4.3.2 notes that the EIA Regulations apply to water. The WRA must be provided and reviewed by Anglian Water and other stakeholders prior to the end of the Examination. The Secretary of State cannot make a decision about the harms set out above without the report. The review of the WRA cannot be left to individual Local Planning Authorities, post-decision, because the impacts are cross-boundary and regional. Water Resources East states that, "Eastern England is classified as severely water stressed, yet demand for water is growing with one of the highest rates of new housing development in the country. Unless urgent action is taken, the region will face severe water shortages." Anglian Water is currently operating a hosepipe ban, and Water Resources East said on 16 July, "The latest Hydrological Summary highlights the growing pressure on water resources in the East of England, with notably low to exceptionally low river flows recorded across parts of East Anglia following a hot, dry June." A linear infrastructure project across 180km of the region (the biggest ever DCO..) will require substantial quantities of water that appear not to be planned for. We can see already the impact of infrastructure projects of a far smaller scale on water supplies, in Rivenhall, Essex where the Indaver Incinerator is located: 'In an email from a senior planning officer at Essex County Council, seen by the BBC, they said the water being supplied to the incinerator had created a "strain on the existing infrastructure".' Residents are already suffering from low water pressure, and this is an area directly crossed by the N2T Project. The region is facing high housing targets, for which construction and subsequent occupancy require significant amounts of water:	The Applicant has been engaging with Anglian Water regarding the water needs of the Project via Anglian Waters' InFlow Platform, therefore details are not included within the document library. The Inflow Platform is Anglian Water's portal which it requires customer and developers to use for a range of service applications. Responses to ExQ2 **[REP5-225]** sets out the position of Anglian Water, noting that, following review of the Applicants WRAs, it has been confirmed to the Applicant that in principle, the non-domestic water resources can be made available to supply the needs of the construction phase of the Project within Anglian Water's supply area. Discussions will continue through the detailed design stage of the Project and the Applicant will submit a water connection applications via the Inflow portal. This is reflected in the **5.9.26 Signed Statement of Common Ground - Anglian Water [REP7-138].** The potential use of water tankers has not been included within the trip generation HGV counts at this stage of the design and programme development due to the level of information not currently being available. **7.3 Outline Construction Traffic Management Plan [Revision G]** details the robust monitoring and management control measures for vehicle numbers. The Water Tankers (if required) will be managed through the booking system, and compared against the numbers within **7.11 Transport Assessment [REP7-356]** and **6.16.A4 Environmental Statement Chapter 16 Appendix 16.4 Traffic and Transport Construction Effects [REP7-310]**.

Examination Library ID	Name	Matter	Applicant Comment
		"Rising demand on Britain's network means three quarters of the 1.5 million new homes promised by Labour are at risk of being blocked because the country is running out of water. In the past week, water companies told the Government that there were only supplies to serve an extra 420,000 homes without risking shortages. Their analysis warned that official assumptions about water consumption and leak reductions were unrealistic and failed to take account of rising demand from data centres." The Water Resources Assessment for N2T must also take into account the cumulative water requirement of other projects in the project area, such as Bramford to Twinstead, North Falls, Five Estuaries and Tarchon. Should the Applicant choose to sidestep the regional water issue by bringing in construction water for Norwich to Tilbury by tanker, then this in itself will require scrutiny, due to the emissions and traffic impact, and also WFD/domestic supply impact on any region from which the water will be shipped. The Applicant's statement (ES Chapter 12: Hydrology, Land Drainage and Flood Risk, August 2025), "It is also assumed that there would be no new temporary or permanent abstractions and that the water supply needs of the Project during construction would be sourced either from mains water supply or in remote locations; where this option may not be available, water would be tankered in." cannot be taken at face value. It appears to us that the following remains unknown: • Total estimated water volume required for construction, split potable/non-potable and by project phase/section • Number and frequency of tanker deliveries assumed, and over what duration • The water source(s) tankers would draw from, and confirmation there is headroom without requiring a new abstraction licence at that source • Whether these movements are included in the Traffic and Transport chapter's HGV counts • Whether the associated transport emissions are included in the GHG assessment total. EN-1 says (4.3.20), "The Secretary of State should have regard to the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and enjoyment of nature. This includes having regard to the achievement of statutory targets set under the Environment Act." The Secretary of State cannot do this in the absence of evidence. Put simply, a DCO cannot be granted without evidence that water can be made available for construction without harms under the WFD to rivers and aquifers, harms to domestic water supply under the Water Industry Act 1991 and without undue traffic movements/GHG emissions.	
REP7-568	Pylons East Anglia	*7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management (Tracked) (Final Issue C) [REP6-081]* There appears to be an error in Table 4.3 of Document: 7.2 Outline Code of Construction Practice Appendix F Outline Noise and Vibration Management Plan - Tracked Changes Version Final Issue C July 2026. It shows the noise thresholds the wrong way round such that they are lower for the day time hours and higher at night time.	The Applicant thanks the Pylons East Anglia for bringing this typographical error to our attention. This had been corrected at Deadline 7, in **7.2 Outline Code of Construction Practice Appendix F Outline Noise and Vibration Management Plan [REP7-332].**

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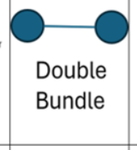
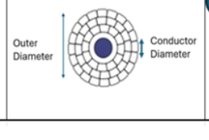
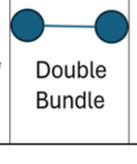
REP7-568	Pylons East Anglia	*8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 (Final Issue A) [REP6-114]* TS Conductor The Applicant fails, once again (in Appendix D1 of 8.4.145), to address the point we are making: 1. The existing grid COULD carry more energy using TS Conductors (or equivalent composite-core HTLS). This would reduce the amount of new infrastructure required. 2. IF pylons/overhead lines are considered, then fewer and lower towers are required if TS Conductors or equivalent are used. This is because the weight is lower for the same capacity. Fewer and lower towers results in lower project cost and quicker build times. The Applicant is comparing apples with pears when it talks about conductors like MATTHEW GZTACSR which it has been using for 20 years. It does not appear that the Applicant has modelled TS Conductor (or any composite-core HTLS) on the proposed structures, or on the existing structures. In addition, the Applicant's phrasing — "designed... to allow greater losses" — has it backwards. Composite-core conductors aren't designed to permit greater losses; they're designed to have lower resistance, and the higher temperature ceiling is there so you can actually use that extra capacity, not so you can tolerate worse efficiency. Next, the Applicant treats 5000A as an immovable fact of the system rather than a design choice. But if the constraint is equipment-based, then it's not physically immovable. The Applicant has not demonstrated how the system cannot be upgraded alongside any conductor enhancements. This appears to be a scope choice, not an inherent limit of the network. The ExA will be aware that we dispute the Applicant's need case, both in terms of MW boundary gap and timings of generation connections. That said, presenting the system as being within 300 MW of maximum capability, is not a reason to reject higher capacity conductors on the existing infrastructure or for use along the N2T corridor. The comparison given by the Applicant of Triple Araucaria vs HTLS is not like-for-like. In essence it is comparing two different sized bundles and it is therefore meaningless.	TS Conductor and High Temperature Low Sag Conductors It is very clear that the respondent does not understand the facts around the different types of conductors and has not read the data sheets associated with them. The Applicant refutes the accusation that it has given information that is incorrect or 'backwards' and has experience of all standard conductors and High Temperature Low Sag (HTLS) conductors. The respondent appears very focused on TS conductor for the reason that National Grid Partners has involvement with this manufacturer. The Applicant and National Grid Partners are legally separated entities, with required legal separation as a regulated business; the Applicant has no influence or affiliation with this business. However, there are many manufacturers of similar conductors worldwide including companies such as 3M Conductor who make a carbon composite conductor and have done for some time. The respondent appears focused on the sales material for TS conductor, which is trying to sell a product without the technical context of what is being stated. Set out below is the actual data from technical data sheets for all conductors, showing in empirical evidential fact the conductor technical data in detail. The Applicant has internal data for circuits already in service on its network set out in TGN(E) 166 "Electrical Parameters and Impedance Characteristics of Plant Lines and Cables". An extract of this is provided in Table A2 below (full size in **Appendix D** of this document)**.** of this document) and provides the AC resistance of conductor types. TS conductor provides publicly accessible data sheets on their website "Technical Resources Data Sheet2" with "Harvard Conductor" taken as a point of comparison" **TGN(E)166 Issue 2 February 2002** **Table A2 Conductor Parameters** Conductor Name / Earthwire & Phase Conductors — Material — Conductor Outer Radius (mm) — Conductor Outer Diameter (mm) — AC Resistance (Ω/km) — Number of strands. — Resistivity of conductor material (μΩm) HORSE — ACSR — 6.975 — 13.95 — 0.3936 — 12/7 — 0.2655 FIBRAL/24 — Al Alloy /Steel — 10.30 — 20.60 — 0.163 — 18/10 +fibre — 0.0295 KEZIAH — AACSR — 9.765 — 19.53 — 0.1654 — 30/7 — 0.0295 LYNX (phase) — ACSR — 9.765 — 19.53 — 0.1586 — 30/7 — 0.02826 LYNX (earthwire) — ACSR — 9.765 — 19.53 — 0.1489 — 30/7 — 0.02655 ZEBRA (phase) — ACSR — 14.31 — 28.62 — 0.0684 — 54/7 — 0.02826 ZEBRA (earthwire) — ACSR — 14.31 — 28.62 — 0.0643 — 54/7 — 0.02655 FINCH — ACSR — 16.42 — 32.84 — 0.0443 — 54/19 — 0.02826 COLLYBIA — ACAR — 15.16 — 30.33 — 0.0589 — 24/37 — 0.02826 (Al) 0.0325 (Alloy) UPAS — AAAC — 12.35 — 24.71 — 0.0878 — 37 — 0.0312 TOTARA — AAAC — 14.49 — 28.98 — 0.0652 — 37 — 0.0312 RUBUS — AAAC — 15.75 — 31.50 — 0.0558 — 61 — 0.0312 SORBUS — AAAC — 16.695 — 33.39 — 0.0500 — 61 — 0.0312 ARAUCARIA — AAAC — 18.63 — 37.26 — 0.0400 — 61 — 0.0312 REDWOOD — AAAC — 20.52 — 41.04 — 0.03443 — 61 — 0.0312 MATTHEW — AACSR — 15.75 — 31.50 — 0.0478 — 54/7 — 0.0287 COMPACT 33.5 — AAAC — 17.51 — 35.02 — 0.0352 — 46 (Trpz.) — 0.0305

[2] https://tsconductor.com/technical-resources/

Table Ref B Parameters from TGN(E) 166 and TS Conductor Technical Resources Data Sheet (publicly Downloadable)

"14 64 KCMIL_Harvard_AECC_TW_M3_TS"

Conductor Name	Construction Type	Conductor Type	Max Temp	Outer Diameter	Conductor Diameter	AC Resistance	Mass	Diagram	Configuration	Effective Bundle AC Resistance Conductors in parallel	Achievable Rating (Amps) [5000A IEC Max]
ARAUCARIA (AAAC)	All Aluminium Alloy Conductor	Standard	90 °C	37.9 mm	37.9 mm	0.0400 Ω/km	2,269 kg/km			0.0133 Ω/km	5000 A
MATTHEW (AACSR)	Aluminium Alloy Conductor Steel Reinforced	High Temp Low Sag	170 °C	31.5 mm	31.5 mm	0.0476 Ω/km	2,179 kg/km			0.0238 Ω/km	4720 A
TS_COND HARVARD	Aluminium Encaspsulated Carbon Core	High Temp Low Sag	200 °C	32.8 mm	8.5 mm	0.0407 Ω/km	2,146 kg/km			0.0204 Ω/km	5000 A

As Table Ref B above shows (provided full size in Appendix D), the AC resistance of all the conductors is broadly similar. The respondent is correct that carbon is a far better conductor of electricity. However, the actual physical size of the carbon conductor in the TS conductor is a much smaller part of the overall conductor only 8.5mm in diameter for Harvard conductor with overall diameter of 32.8mm, with the rest of conductor forming the structural support for the physical conductor for mechanical strength.

As stated by the Applicant correctly before, resistance is a function of the cross-sectional area of the conductor. Therefore, the higher current carrying capability of HTLS generates more heat from losses as the currents increase. This is why the HTLS conductors operate in the higher range of 170 – 200 degrees in the data sheet examples compared to the maximum 90 degrees of the standard conductor.

The lowest overall resistance is the ARAUCARIA conductor at 0.0400Ω/km, hence as the Applicant stated before, this offers the lowest economic cost and losses solution to consumers to achieve the 5000A maximum rating. In triple bundle formation the effective AC resistance drops to 0.0133Ω/km to meet the 5000A max rating. This is why the triple bundle reduces losses and provides value to consumers and businesses.

TS conductor could be used in triple bundle to match the same circuit AC resistance, but the circuit would still be limited to 5000A by connection. No transmission provider would choose a more expensive solution to achieve the same maximum rating 5000A rating, providing no additional benefit.

All the existing towers in East Anglia are built strong enough to take triple bundles and the Applicant can achieve the highest IEC 5000A rating with ARAUCARIA in triple bundle formation. Therefore, there is no need to use more expensive, harder to maintain and string conductor solutions in this case, as the maximum rating can be achieved with the standard conductor solution. The assertion made by PEA - without reference to data sheets and evidence - that any HTLS conductor provided by any manufacturer (many have HTLS

solutions some including carbon composite variations) would provide a benefit in this case is not true.

It is PEA's assertion that the comparison of conductors is not equivalent, however the above table demonstrates the assertion is incorrect. The comparison in the table in terms of physical size, weight and AC resistance is directly comparable as factually shown in the table developed from actual data. The Applicant always uses configurations of two or three conductor bundles for management of Induced Current, Conductor Noise and EMF performance. All of these issues are influenced by conductor bundle configuration and tower configuration. Therefore, as shown in Table Ref B, comparing each conductor of similar weight and configuration and actual parameters, for the use of two HTLS conductors, the weight and configuration of each type is selected to allow use in the same configuration used by MATTEW (Gap Conductor) on less structurally capable towers where additional expense of conductor and higher resistance/operating temperature is best balance to achieve higher ratings.

IEC 5000A Rating Specification

The International Electrotechnical Commission (IEC) set specifications for 420kV substation equipment including Switchgear, limiting the current that can continuously be carried in substation bars and equipment. For a 420 kV, 5000 A switchgear and substation setup, equipment must comply with the IEC 62271 series (specifically IEC 62271-1, IEC 62271-100, and IEC 62271-203). At this ultra-high voltage, 5000 A is a heavy-duty continuous rating primarily found in Gas-Insulated Switchgear (GIS) and large Air-Insulated Substations (AIS).

The typical range for substation continuous ratings for 420kV are more typically 3150A and 4000A, of which the Applicant has many examples. The 5000A rating is very recent and represents the cutting edge of substation and switchgear ratings in the world. The UK and Japan in general operate the highest 420kV rated circuits and equipment in the world. Our networks are on small islands with short circuit lengths serving large dense populations, relatively short distance (circa 100s km) are necessary to be able to operate circuits at such a high-capacity level. PEA wrongly asserts without evidence that the 5000A limitation is a design choice. In fact, not all manufacturers offer 5000A equipment and those that do, have only done so relatively recently. The management of such high currents is not insignificant, and the forces equipment experience takes materials to their limits. The Applicant is not aware of any standards set by the IEC or manufacturers offering, designing, building and testing equipment for use at 420kV with ratings greater than 5000A for substation switchgear or wider substation equipment. Therefore, it is not a "Design Choice" it is factually a design limitation, driven by equipment to which circuits can connect.

Impact of operating a Transmission System at High Currents

Power System Engineering is a highly complex subject, the principles of which can be established in textbooks such as "Electric Power Systems – B.M. Weedy & B.J.Cory", "Power System Analysis – John.J.Grainger & William D.Stevenson". The principles of operation, physics and maths behind the majority of the subject need to be taken into account when looking a current and power flows on a transmission system.

As stated earlier, the UK and Japan are unique in terms of having some of the highest capacity 420kV transmission in the world. The amount of power that can be sent down a circuit has some limitations including Natural Line Loading. The longer the circuit, the worse

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the Natural Line Loading gets. So, in the UK and Japan we are blessed to send high power over relative short distances.

In the US where circuits can be 1000 miles long, power is very hard to transmit. TS Conductor is a US based company and has a lot of marketing that specifically seeks to address the US market. Where single circuit small towers unable to carry heavy conductors, spanning over long distances (1000s of miles) are common, this is very different from the UK. Therefore, context is everything, and marketing is trying to sell a product. However, facts are key to establishing why each technology adopted appropriately.

Given the UK already operates some of the highest capacity 400kV circuits in the world, pushing power system effects hard. Other areas that are impacted by design changes and very high currents, that power systems theory applies to and must be considered, on system resilience and power system performance with higher the I2 (current squared) effects:

- Natural Line Loading (function of Length & Current).
- Voltage Stability.
- Transient Stability.
- Power Curve Brittleness (Higher the current, more brittle power curve becomes)
- I2X losses and need for mid-point capacitive line compensation.
- Point on Bar Loading analysis for hot joints in substations (impacting 5000A limit).
- Sub-synchronous resonance effects (a function of pre-fault power transfer).
- Voltage Step Change under fault.
- Induced current performance.
- Noise performance of conductor and bundle configuration.
- EMF performance of circuit and bundle configuration.

Conclusions

PEA wrongly asserts positions without facts or reference to any data to substantiate the arguments.

- Fact – HTLS conductors from any manufacturer including TS conductor are highly useful to allow transmission companies to achieve high ratings on transmission infrastructure not capable of carrying heavier standard conductor solutions (not the case in East Anglia, but used widely in areas of transmission system with less mechanically strong infrastructure)
- Fact - the conductor systems evaluated are equivalent and the Applicant has drawn the comparison factually, referring to actual conductor data.
- Fact - 5000A is a design limitation set out in IEC standards representing the highest 420kV rated equipment to connect circuits as substations in the world.
- Fact – The existing system being uprated to meet this maximum design rating as set by 420kV IEC standards is the limit of the existing system as set out in the Need Case and is therefore the limit of the existing physical system.
- Fact – TS conductor is not the only manufacturer producing a HTLS conductor, and PEA’s focus on marketing material without context or facts leads to assertions that analysis of the data above sets needed context to.

Examination Library ID	Name	Matter	Applicant Comment
			• Fact – PEA has not taken into consideration any adverse effects of high current adverse operation and the complexities of The Power System physics, severely impacting power system resilience and security of supply.
REP7-568	Pylons East Anglia	*8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 (Final Issue A) [REP6-114]* Cable swathes (7) and Haul roads (8) Under heading "7. Cable swathes", the Applicant has simply requoted sections from the Applicant's previous submissions [REP4-300] and [REP1-139] and therefore not responded to the issues raised by PEA in [REP5-265]. Consequently, the discrepancies highlighted by PEA relating to trench sizes and the resulting cable swathes remain unaddressed. As highlighted by PEA in [REP5-265], "significant inconsistencies are apparent between the underground cable construction data presented for this project and that for other projects. Such data is critically important when assessing different alternatives". In carrying out its assessment in [REP5-265], PEA consulted a wide range of sources. Major anomalies existed however even when only comparing trench data supplied by the Applicant for the Norwich to Tilbury project with corresponding data supplied by the Applicant for the EGL 3 and EGL 4 project. Therefore, the conflict in the evidence provided by the Applicant for the two projects remains. As the trench size largely dictates the resulting width of the cable swathe this is very important data. This is not only due to the width of the trench. For the construction swathe, the trench depth and other aspects of cross-sectional geometry are important due to the impact on the resulting soil stockpiles that are sited adjacent to the trenches. As illustrated by the drawings from PEA in [REP5-265], the impact on the resulting cable swathe is very significant. Questions raised by PEA in [REP5-265] are copied below: • Why would the HVDC trenches for the Norwich to Tilbury project be 50% deeper than the HVDC trenches for the EGL 3 and EGL 4 Project when the capacity of the cable pair in each trench is the same, noting that with the splayed excavation an increased depth leads to increased width? • Why for the Norwich to Tilbury project would the HVDC trenches be 50% deeper than the HVAC trenches, noting that for the EGL 3 and EGL 4 Project the depths of HVDC and HVAC trenches are identical? • Why is there a significant discrepancy between the HVAC trench base widths for the two projects? • Why are there discrepancies between the proposed excavation slope angles, noting the significant impact this has on trench width and therefore construction impact? As stated in PEA submission [REP5-265], "These issues are very significant to the trade-offs between the options and the harm caused. This arises for example from the impact on land take, the amount of material that needs to be excavated and the amount of material that needs to be brought in." Further information on other HVDC projects was obtained by PEA after the submission of [REP5-265]: Information presented at the non-statutory consultation in July 2026 for the proposed Tarchon Interconnector Project showed the typical width of a HVDC cable trench to be 2m. A Tarchon representative at the event stated that the typical trench depth would be	As highlighted by Pylons East Anglia (PEA), the Applicant has previously provided clarification to PEA on the differences of HVDC and HVAC cable swathes, most recently in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**. This is replicated below for convenience, from pages 29-30 of **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]**: '***7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]*** *states that 'HVDC onshore cables have advantages over AC cables having significantly less land take, and therefore somewhat lower environmental impact.' (paragraph 1.3.11). However, this comment only applies where HVDC onshore cables are used over a long distance, which is their typical use. The benefit in terms of land take of HVDC onshore cables as opposed to high voltage alternating current (HVAC) onshore cables is the potential reduction in construction swathe due to the lower number of cables required. For a comparable 6 GW HVDC connection an illustrative construction swathe of 85 m would be expected for standard open cut installation; details are provided in* ***8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]*** *Annex C Figure C1. In comparison* ***2.6.1 Design and Layout Plans - Subs and Cables [REP1-003]*** *National Grid Drawing Reference AENC-MMAC-ENG-DWG-0085-01, shows an illustrative construction swathe of 120 m. The reduction in temporary land take of the construction swathe for an HVDC installation is therefore 3.5 ha per km less than the equivalent HVAC installation*.' **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** (pages 42 – 43) confirms: '*considering a 6 GW HVDC cross section for installation efficiencies, the haul road would be located in between the three trenches, with two trenches on one side and the remaining trench on the other side. This would create an overall cable swathe of around 41 m in an 85 m construction swathe (refer to the figure in Annex C) compared with the indicative 50 m cable swathe for alternating current (AC) installation within a 120 m construction swathe*.' Cable burial depth and spacing will be determined during detailed design, as these parameters directly influence cable rating (capacity) and must be considered at a system level once all project constraints have been confirmed. The typical defining technical constraint for High Voltage underground cable cross-sections is the required separation between circuits, this is independent to the slope angle of the trenches. The Applicant requires a minimum depth of cover to protective tiles of 900 mm within agricultural land. This is a minimum requirement, and cables can be installed deeper where constraints occur such as at utility crossings and under watercourses and ditches. The steepness of any slope excavation would be informed by the detailed design ground investigation surveys, the slope angles illustrated in the cross sections in **2.6.1 Design and Layout Plans - Subs & Cables [REP6-020]** (AENC-MMAC-ENG-DWG-0085-01) and in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**, Appendix C are illustrative. Following receipt and assessment of the detailed ground investigation data, and as part of the detailed design process, steeper excavation slope angles may be adopted where appropriate, as these can offer construction efficiencies. However, notwithstanding this, the typical defining technical constraint for each cross-section continues to be the required separation between circuits, regardless of the slope

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	1.4 to 1.5m (which aligns with the EGL 3 and EGL 4 project). The relevant image from the display board is provided in Figure 1. [Applicant note: figures included in the original comments document REP7-568 has not been reproduced here due to formatting] Orsted has recently reported that the ducting to accommodate the HVDC cables for the Hornsea 3 has been completed and published various related images and videos. The image in Figure 2 is from the "Hornsea 3 Project Progress Report May 2026"7. If the survey "ranging poles" that can be seen spanning the top of the trenches in Figure 2 are the typical 2m length (with 0.5 m graduations)9, this would indicate that the Hornsea HVDC trench width is also around 2m. These two additional data sources provide further comparisons with the HVDC trench width of 9.8m and trench depth of 2.1m stated in the Applicant's drawing "Figure C1" in Annex C of "8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1" [REP1-139]. In [REP6-114], the Applicant requotes the following from the Applicant's [REP4-300] response: "For a comparable 6 GW HVDC connection an illustrative construction swathe of 85 m would be expected for standard open cut installation; details are provided in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] Annex C Figure C1. In comparison 2.6.1 Design and Layout Plans - Subs and Cables [REP1 -003] National Grid Drawing Reference AENC-MMAC-ENG-DWG-0085-01, shows an illustrative construction swathe of 120 m. The reduction in temporary land take of the construction swathe for an HVDC installation is therefore 3.5 ha per km less than the equivalent HVAC installation." "Layout A: Construction swathe" on page 13 of PEA "Response to Section 3 of [REP4-300] 8.4.10.1 (Applicant's Comments on PEA Appendix D The Requirement for Good Design [REP3-132]" in [REP5-265]10, illustrates a 6 GW HVDC construction swathe of 61 m. This was derived by PEA using the HVDC underground trench dimensions specified by the Applicant for EGL 3&4 but with the splay angle specified by the Applicant for the Norwich to Tilbury project HVAC underground trench in [REP1-003]. The resulting width of the trench at the surface was 4.3m. When compared with the Applicant's illustrative construction swathe of 120 m for underground HVAC this results in a reduction in temporary land take for a HVDC installation construction swathe of 5.9 ha per km less than the equivalent HVAC installation. This is therefore significantly different to the 3.5 ha per km figure quoted by the Applicant for a HVDC underground construction swathe of 85 m. If of assistance, the calculation spreadsheets and CAD models produced by PEA for the analysis in PEA submission [REP5-265] are available for issue to the Examination. If the trench width was reduced to 2m, in line with the figure presented by Tarchon (and as also appears to apply to Hornsea 3), the reduction in temporary land take from the HVDC alternative would be significantly greater. These figures assume a 6 GW HVDC connection. The 6 GW HVAC – 4 GW HVDC equivalence demonstrated by the Applicant on EGL 3&4 would result in just two cable trenches for the HVDC option and therefore a further substantial reduction in the both the construction and the permanent cable swathes. The substantially greater width required for underground HVAC increases the difficulty in navigating constraints and consequently can greatly increase the harm caused. This can be seen in the Dedham Vale National Landscape where it has resulted in the need	angle of the trenches. Therefore, the total width of the cross sections illustrated in **2.6.1 Design and Layout Plans - Subs & Cables [REP6-020]** (AENC-MMAC-ENG-DWG-0085-01) and in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**, would only be subject to a minimal change if the slope angles of the excavations were increased. This can only be confirmed following receipt of the detailed design ground investigation surveys. The Applicant therefore considers the assessment set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** (pages 42 – 43), remains accurate and unchanged.

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		to split the route in two. The resulting harm would be spread over a considerable area, as can be seen in Figure 3. The image was copied from the Applicant's 2025 Norwich to Tilbury Interactive Map, with one dimension relating to the order limit separately added to provide an indication of the scale. The scale also becomes apparent when viewed against the size of houses, fields, the River Stour and other features that can be identified in the image. This route alignment requires a haul road in each of the two branches.	
REP7-568	Pylons East Anglia	*8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 (Final Issue A) [REP6-114]* Under heading "8. Haul roads", the Applicant states: "Haul roads are required to deliver the cable drums to location for installation for both cut and cover, and cable ploughing solutions". It is not the case that haul roads are always required for these options. Cut and cover PEA submission [REP5-265] provided a link to a TenneT video showing the cut and cover installation of underground HDVC cables without the need to construct haul roads. In the video re-usable "wooden beams or metal plates" are utilised to support the heavy loads. [REP5-265] also provides information on the Shetland HVDC Link, where similar techniques have been used. The image in Figure 4 from the Tarchon Interconnector Project non-statutory consultation in July 2026 also shows HVDC cable laying without the need for a haul road12. This was despite a haul road being shown in the schematic cross-section. The representative from Tarchon explained that the haul road was shown on the schematic to indicate the worst case, but the final technique would be chosen to suit the ground conditions. [Applicant note: figure included in the original comments document REP7-568 has not been reproduced here] Cable ploughing This is discussed in detail in PEA submission [REP6-229] "Appendix A: Cable Ploughing", which was written in response to the recently published Ramboll report. Information on this method has previously been presented to the ExA by PEA at Deadline 1. This took the form of an evidence report in Appendix B of "EN020027-001370-Pylons-East-Anglia-Ltd-written-posthearing-submissions.pdf" [REP1-266]. By default, haul roads are not used with cable ploughing, although the Ramboll report does warn that they may be required in some circumstances. However, with both cut and cover and cable ploughing techniques the much lower material requirement of HVDC technology compared with HVAC technology means that the need to use haul roads is significantly reduced. In the case of the Norwich to Tilbury project the cable requirement alone would be reduced by two thirds, even if both options are to provide 6 GW capacity. This is in addition to the substantial reductions in the amount of material that needs to be excavated and the amount of backfill and other material that needs to be imported. PEA submission [REP6-229] "Appendix A: Cable Ploughing", provides illustrative calculations relating to the volume of aggregates and land take associated with the haul roads shown in the current Norwich to Tilbury project plans.	The Applicant has stated numerous times in its responses that each individual HVDC/AC 2500mm-3000 mm cable can only be delivered via roads in drum sizes carrying circa 1km of cable. Each cable requires a joint bay at approximately 1 km intervals. Consequently, the cable drums for each individual cable must be delivered to the specific section of the cable route in which they are to be installed. Given the significant weight of the cable drums and the vehicles used to transport them, the haul road is required to provide access to each installation location, irrespective of the installation technique adopted. Following delivery, the cable is installed between the adjoining joint bays across the corresponding 1 km section of the cable route. Typically, a drum carrying 1km of 2500 mm 400 kV cable will weigh circa 40 Metric Tonnes. Hence road infrastructure to service every 1 km section of cable installation is essential, and cable ploughing does not change the physical drum size and weight of cable or the need for it to be delivered to the installation section. Alternative haul road options, including the use of geogrids, soil stabilisation, or alternative haul road constructions such as track matting, may be identified in some instances. The process of determining this will be carried out by the Main Works Contractor(s) at the detailed design stage to refine the temporary haul road where site-specific conditions are suitable and practicable to do so.
REP7-578	Caroline Homewood	[*Applicant note: this response is summarised due to similarity with previous submissions*]	

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	[Note: not in alphabetical order as grouped with Robert David Wass]	Response to Document 8.4.14 – Applicant's Comments on Further Information Submitted at Deadline 5 Ford Street Conservation Area, Fordham, Aldham and the Colne Valley Concern raised that the Applicant has not sufficiently responded to evidence provided by Interested Parties at Deadline 5 relating to Fordham, Ford Street and Aldham. In particular that the following points are not addressed: • Cumulative impacts of the TB046 to TB057 corridor have not been assessed • Topgraphical evidence provided by Interested Parties to refute the Applicant's reasoning for its alignment of the Project in the Colne Valley • That heritage assets in Fordham, Ford Street and Aldham are not sufficiently assessed as a heritage landscape • The different approach taken with regard to undergrounding in the Waveney Valley compared to the Colne Valley, with no cumulative assessment undertaken for the Colne Valley before undergrounding was rejected. Evidence provided by Interested Parties to demonstrate that the Holford Rules have not been complied with	The Applicant notes the respondent's opinion that its responses at Deadline 5 are not sufficient. The Applicant disagrees with this position and notes that should the ExA require more information than has been provided, this request can be made of the Applicant. The Applicant does not agree that references to previous submissions constitute a failure to engage with the matters raised. The purpose of the references provided is to identify where the Applicant's reasoning, evidence and professional judgements are set out in detail. The issues identified in this comment, including landscape, heritage, cumulative effects and reasonable alternatives in Ford Street, Colne Valley, Aldham and Fordham have been the subject of extensive discussion throughout the Examination and have been addressed in detail within the Environmental Statement, written responses, hearing submissions and Statements of Common Ground. Where the same points have been raised repeatedly, the Applicant has considered it proportionate and appropriate to direct the Examining Authority to the submissions where those matters have already been addressed in full, rather than reproducing substantial volumes of text across multiple documents. At Deadline 6, the Applicant did respond to the Deadline 5 submission by the respondents **[REP5-284, REP5-309]**, on page 19 of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114].** The Applicant reviewed the submission and identified that many of the points raised were similar to or extensions of points made in the respondent's Deadline 4 submission within **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]**, page 37-46 and **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]**, page 84 to 876. It was therefore not considered appropriate or proportionate to respond again and the Applicant maintains its position as stated in those earlier submissions. Throughout the development of the Project and during the Examination, the Applicant has provided extensive consultation, technical and environmental information to explain the Project, the alternatives considered, and the reasons underpinning the decisions taken. While stakeholders may disagree with some of those decisions or the conclusions reached, the Applicant's objective has consistently been to provide sufficient information to enable informed participation in the process and to engage constructively with the issues raised. The Applicant further responded in detail to comments regarding the Colne Valley in Section 5.2 of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118].**
REP7-587	Robert David Wass	*[Applicant note: this response is partially summarised due to similarity with previous submissions]* Concern raised that the Applicant has not sufficiently responded to evidence provided by Interested Parties at Deadline 5 relating to Fordham, Ford Street and Aldham. In particular that the Applicant has not adequately addressed the substantive concerns raised by Interested Parties regarding landscape, heritage, cumulative effects and reasonable alternative, relying upon repeated cross-references to earlier submissions. In particular: • the Applicant has not demonstrated a comprehensive assessment of cumulative effects and transformation of the character of the Colne Valley • the Applicant has not sufficiently addressed the effects to the setting of Ford Street Conservation Area • Insufficient evidence has been provided to demonstrate individual towers are located to minimise landscape harm Heritage assessment is not sufficient in considering the cumulative impact on Ford Street Conservation Area, Aldham Church, the Essex Way and the wider historic landscape.	
REP7-587	Robert David Wass	Woodland and Landscape Structure The proposed removal of mature trees and woodland cannot be adequately mitigated through replacement planting. Mature landscape features provide immediate visual screening, ecological value and historic continuity that will take decades to replicate. Consequently, the residual landscape effects have been massively understated by the applicant.	The Applicant acknowledges that mature trees, woodland and hedgerows provide immediate landscape, ecological and historic value that cannot be replicated instantaneously through replacement planting. For this reason, the Project has applied the mitigation hierarchy throughout the design process and will continue to avoid and minimise impacts to these features, wherever reasonably practicable, through detailed design. The Applicant wishes to reassure the IP that following detailed design (post-consent) it is anticipated the amount of vegetation loss would be reduced and impacts to trees (including woodland) and hedgerows will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** and **7.2 Outline Code of Construction Practice [Revision H]** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees, woodland and hedgerows, where practicable. **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** sets out a comprehensive mitigation strategy for habitat loss (temporary and

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			permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. Individual trees and trees within small groups are subject to a 3:1 replacement commitment. Details of the onsite tree planting resulting from the 3:1 commitment will be provided in accordance with Reinstatement Planting Plan(s) secured under Requirement 9 of **3.1 Draft DCO [Revision H].** The Applicant will prioritise the replanting of trees within the Order Limits. Any offsite provision of trees will be determined when Requirement 8 (Retention and removal of trees, woodland and hedgerows) and Requirement 9 (Reinstatement planting plan) have been discharged. The Applicant will provide an Offsite Planting Delivery Scheme to the relevant local planning authorities which will identify the quantum of offsite tree planting to be delivered, identify an approach to delivery and site selection criteria, identify (where appropriate) locations for offsite planting or alternatively details of organisations which shall deliver the planting, and identify proposed timings for delivery. The Applicant has also committed to deliver 10 % Biodiversity Net Gain with wider environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Woodlands are mitigated through the BNG metric and captured in **7.1 Biodiversity Net Gain Report [REP7-320].** The Applicant does not agree that residual landscape effects have been understated. The LVIA transparently identifies significant adverse effects where they are predicted to occur, including major adverse effects within parts of the Colne Valley. These conclusions already take account of the loss of vegetation and the time required for replacement planting to mature. Accordingly, the Applicant considers that the likely effects have been robustly assessed and appropriately reported.
REP7-587	Robert David Wass	Flood Risk and Local Conditions The Applicant's reliance on strategic flood mapping does not adequately reflect significant seasonal recurring localised flooding and surface water conditions experienced in the vicinity of Ford Street. Site-specific evidence indicates that further investigation must be urgently carried out before the effects of the development can be properly understood.	The Applicant acknowledges in its assessments that construction will take place in some areas that are prone to waterlogging and have a higher risk of flooding and has secured robust management measures and mitigations for such sites, as detailed in **7.2 Outline Code of Construction Practice [Revision H].** This will ensure that the Project is resilient to flooding and that there would be no contribution towards increasing flood risk on neighbouring land.
REP7-587	Robert David Wass	Independent Landscape Evidence The independent Landscape Partnership assessment concludes that the Colne Valley is a landscape of high sensitivity and that the proposed overhead line would give rise to widespread and significant adverse visual effects. It further identifies undergrounding as an option that merits consideration in accordance with National Policy Statement EN-5. The Applicant has not provided a persuasive rebuttal of these conclusions	The Applicant does not take the view there is a high potential for widespread and significant adverse landscape visual impacts in the Colne Valley as set out within the following documents: • Table 3.11 of **8.4.12 Applicants Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** in response to Villages Against Pylons **[REP4-380]** • Table D3 and Appendix D2 of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]** in response to Pylons East Anglia Appendix D - Landscape Partnership Report **[REP5-277]** • Appendix B of **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]** in response to LV 2.18 Villages Against Pylons (Planscape Report) **[REP5-277]** • Section 5.2 of Table 2.1 of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** • Table 2.1 of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** in response to response to Aldham Parish Council **[REP6-175]**

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			Table E.6 of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** in response to Deadline 6 Submission Appendix E from Pylons East Anglia **[REP6-229]**
REP7-587	Robert David Wass	Alternatives The Applicant's persistent dismissal of alternative alignments and partial undergrounding does not demonstrate that all reasonable alternatives have been properly evaluated. National policy requires alternatives to be considered where they would materially reduce significant adverse landscape and visual effects [Conclusion -summary of the points above and therefore not replicated here]	The Applicant is confident that it has adequately considered all reasonable alternatives. **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement** (see Section 3.2, Alternatives), describes how the Applicant has considered alternatives from a strategic level to routeing and siting.
REP7-569	ScottishPower Renewables (UK) Limited, East Anglia THREE Limited and East Anglia ONE Limited	*Draft Protective Provisions* Following constructive discussions the SPR parties provided the Applicant with draft Protective provisions on 29 June 2026. The Applicant returned the SPR Parties draft protective provisions late last week with substantive mark-up. The Applicant's version substantially reduced the proposed protections for the SPR Parties, essentially reducing the protections to limited asset protection. The potential interface between the projects at this location is more complex than that. In the absence of an interface agreement the SPR Parties need greater protection, namely complete and adequate protection, than is being offered by the Applicant. At this stage the SPR Parties attach their own draft Protective Provisions which reflect this position at Appendix 1. The SPR Parties will provide an update at Deadline 8 regarding the protective provisions and interface agreement negotiations and remain committed to continuing negotiations with the Applicant following the close of the Examination with a view to reaching agreement on an interface agreement and protective provisions and will update the Secretary of State accordingly as negotiations progress. Appendix 1 Draft Protective Provisions The IP provides a summary of the outstanding matters and changes that ScottishPower Renewables (UK) Limited, East Anglia THREE Limited and East Anglia ONE Limited are seeking.	The Applicant notes the SPR parties' comments in relation to the draft protective provisions submitted by the Applicant at Deadline 7. It is the Applicant's view that the version of the protective provisions it submitted at Deadline 7 provides the SPR parties with a sufficient level of protection of their retained assets and site access. As set out in **8.29.12 Application under Section 127 Planning Act 2008 - Scottish Power (UK) Renewables Limited (East Anglia THREE) (EA3)**, the protective provisions (which apply on substantially the same terms for all the SPR parties) ensure access to the EA1 and EA3 substations from Bullen Lane and to the SuDS pond from the substations; provide retained apparatus protection in respect of any SPR parties' apparatus with which the Project interacts, in particular the EA3 and EA1 underground cables; prevent the Applicant from acquiring any of SPR parties' apparatus without the prior agreement of the SPR parties; prevent the Applicant from exercising their CA powers in such a way as to extinguish the SPR parties' existing access rights along Bullen Lane and the access road to the substations without any simultaneous regrant of the same rights or otherwise put the SPR parties back into the substantially same position in respect of its existing land rights to access along Bullen Lane and the access road to the EA1 or EA3 substations; prevent the Applicant from exercising their CA powers in such a way as to extinguish SPR parties' existing land rights related to the apparatus without any simultaneous regrant of the same rights or otherwise put the SPR parties back into the substantially same position in respect of its existing land rights to the apparatus and; provide the SPR parties with assurances that any expenses incurred by them in respect of any interference with its apparatus by the Project shall be covered by the Applicant. Notwithstanding, the Applicant welcomes the continued engagement with the SPR parties since Deadline 7 to narrow the issues on the protective provisions and to continue to negotiate the heads of terms for the legal interface agreement following on from Deadline 8 and the Applicant is committed to seeking to resolve the detailed bilateral interface agreement which seeks to address the detailed interactions between the parties. Although the legal interface agreement is not yet completed, the Applicant considers the draft protective provisions provide the SPR parties with the necessary overarching protections required to access, operate and maintain the assets forming part of their statutory undertaking and the legal interface agreement will serve to address the more detailed interactions. The Applicant has also noted the SPR parties' request to update the references to land plots B-20/199, details for which are set out below.
REP7-569	ScottishPower Renewables (UK) Limited,	*Land Plans* The SPR Parties are grateful that the Applicant has reclassified Plot B-20/199 as Class 8 land. However, in undertaking this amendment, it has transpired that Plot B-20/199 does not include the fully fenced substation area.	The Applicant notes the SPR Parties' representation and confirms that Plot B-20/199 was reclassified as Class 8 at Deadline 6 following the relocation of pylon RG208 to avoid any oversailing of the EA1 substation. This amendment formalised the Applicant's decision that it no longer seeks compulsory acquisition or temporary possession powers over Plot B-20/199.

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	East Anglia THREE Limited and East Anglia ONE Limited	The SPR parties note that a section of the fenced area of the EA1 substation is not included within the Class 8 boundary of Plot B-20/199. As a result, the section in question appears to form part of Plot B-20/195, which is Class 2 land. The SPR Parties have made representations to the Applicant that this area also requires to be reclassified as Class 8 land. Until these matters are resolved, the SPR Parties' concerns about the Applicant's Compulsory Acquisition and Temporary Possession powers over land owned by SPR and forming part of the operational EA1 substation will remain.	The Applicant further notes the SPR Parties' comments regarding the extent of the EA1 substation fenced boundary and the potential interaction with Plot B-20/195. This matter has been raised through the ongoing engagement between the parties and is being reviewed by the Applicant as part of the continuing discussions on land rights and interface arrangements. The Applicant will continue to engage constructively with the SPR Parties to understand the concern raised and determine whether any further amendments to the land referencing, plot classification or associated application documents are required. The Applicant notes that discussions regarding land rights, protective provisions and the wider interface arrangements remain ongoing and have been captured within the Statements of Common Ground (**5.9.30 Signed Statement of Common Ground - ScottishPower Renewables (UK) Limited [Revision E]**, and **8.3.94 Signed Statement of Common Ground - East Anglia 3 Three Limited [Revision B]**) and related agreements being progressed between the parties.
REP7-569	ScottishPower Renewables (UK) Limited, East Anglia THREE Limited and East Anglia ONE Limited	*Comments on Deadline 6 Submissions* Having reviewed the Applicant's Comments on Further Information or Submissions Received by Deadline 5 [REP6-114], we note the Applicant's contention that the SPR Parties' concerns regarding the road closure of Bullen Lane are addressed by the commitment within the Outline Construction Traffic Management Plan ("CTMP") [REP6-082] that "existing access…will be maintained throughout the construction phase". However, the Applicant's commitment in the Outline CTMP and Outline Code of Construction Practice [REP6-072] is to maintain access "where practicable", which leaves the SPR Parties still with some concerns. The SPR Parties welcome the Applicant's commitment to provide access at all times within the legal agreement currently under negotiation. The Agreement has yet to be finalised and in the interim bespoke Protective Provisions are necessary. In respect of the Land Plans, we note that the Applicant's remarks in the Applicant's Comments document that Plot B-20/180 is designated as Class 7 (yellow) land, and not Class 1 (brown) land. We note the Land Plans are not reflective of this. Whilst the SPR Parties welcome the Applicant's confirmation that they are only seeking Class 7 rights over Plot B-20/180, this is unclear on the Land Plan. To that end, we request that an inset is added to this sheet of the plan to ensure that this is clear on the Land Plans which would be certified were the application to be granted. We note the update provided in the Applicant's Comments document in respect of the Statement of Common Ground – Overview as listing EA3 and SPRUKL as Affected Persons. Notwithstanding confirmation of this change, it does not appear to have been actioned by the Applicant in the latest version of the Overview document [REP6-047]. Finally, we note that in respect of the Applicant's Statutory Undertaker Tracker, various amendments have been made in respect of the SPR Parties interests. To confirm, as the freehold owner of plots B-20/181, 183, 185, 202 and 215, SPR's interests at row 24 should be listed in the first CA column, rather than the second CA column.	The Applicant provided a response in **8.27 Response to Category 1 and 2 Affected Persons Objections [REP7-516].** The Applicant confirms that the road closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, as secured in Paragraph 5.8.3 of the **7.3 Outline Construction Traffic Management Plan [Revision G].** Existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with East Anglia One Limited and Scottish Power. The Applicant notes this request. The Land Plans identify the land interests and powers sought by reference to the approved colour coding and associated plot references. Plot B-20/180 is identified in the land acquisition schedules as being subject to Class 7 rights only, and the Applicant has confirmed this position previously. The Applicant considers that the Land Plans, when read together with the Book of Reference and other certified land documents, adequately identify the powers sought over the plot. Nevertheless, the Applicant will review whether additional clarification can be provided in the final certified land documents, including through an inset or other appropriate annotation, without affecting the substance of the rights sought. The entry for SPR in **5.9 Statement of Common Ground - Overview [REP7-092]** was amended at Deadline 7 to identify it as an Affected Person. The SPR plots were updated to be listed in the first CA column at Deadline 7 in **8.7 Statutory Undertaker Tracker [REP7-484].**
N/A	Tendring District Council	*Masterplans and Landscape Compensation* TDC notes the Examining Authority's question regarding the Applicant's proposed funding mechanism for landscape compensation. TDC continues to have significant concerns regarding the substantial and long-term landscape effects arising from the project within Tendring District. Whilst TDC acknowledges that the illustrative masterplans have been prepared through	The Council's comments are noted. The Applicant has continued to engage with specific Local Planning Authorities who are leading in these matters on behalf of several other councils, including Tendring District Council in relation to the masterplans and landscape compensation. The Applicant provided an update in Appendix A of **8.4.17 Applicant's Comments on Post Hearing Submissions and Interested Party Action Points [REP7-482]**; this response addressed the concerns regarding deliverability and the mechanism to secure compensation measures.

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		engagement with local authorities, TDC agrees that they remain illustrative in nature and do not provide certainty regarding delivery. The masterplans should therefore not be relied upon as evidence that adequate compensation will necessarily be achieved.	
N/A	Tendring District Council	*Funding Mechanism* TDC agrees that, in principle, the funding mechanism proposed within Annex A of REP6-118 has greater potential to deliver meaningful and measurable landscape compensation than reliance upon illustrative masterplans alone. TDC considers that any mechanism should: • Be secured through enforceable DCO provisions; • Be fully funded by the Applicant; • Be administered transparently; • Be subject to monitoring and reporting; • Deliver measurable environmental outcomes; • Prioritise projects within affected communities; • Support long-term stewardship and maintenance; and • Be capable of adapting to changing local priorities over time. TDC considers that any compensation funding should be additional to, and not offset against, mitigation already required elsewhere through the DCO	The Applicant notes Tendring District Council's support for the principle of the Landscape Compensation, Offsetting and Enhancement Fund. The Applicant considers that the Schedule secures the objectives outlined. In relation to each point identified: • Enforceable DCO provisions - **3.1 Draft DCO [Revision H]** had been updated at Deadline 7 to include Schedule 20 which will enable funding to be provided to those relevant authorities in a one-off payment for them to distribute and realise locally acceptable compensation outcomes at each location in conjunction with landowners and other responsible organisations. The article will be legally binding once the Order comes into force, failure of the Applicant to comply with the DCO would result in the ability for enforcement action to be taken. • Fully funded by the Applicant - The contributions are to be provided by the Applicant and includes a maximum amount that can be spent on the administration of the fund by the LPA to avoid placing a burden on the relevant authorities. • Transparent administration and monitoring and reporting - contributions must be held in an interest-bearing account, accounting records must be maintained, and the Applicant has a right to view the records. Annual reporting is required, including details of measures delivered, expenditure incurred, remaining balances and proposals for future expenditure. • Measurable environmental outcomes - contributions may only be applied to landscape compensation, offsetting and enhancement measures specified within the Schedule. These measures are directed towards landscape character improvement, woodland and hedgerow creation, habitat connectivity, visual screening, public amenity improvements and other landscape enhancement outcomes. • Prioritisation within affected communities - expenditure must be directed to the defined Landscape Compensation, Offsetting and Enhancement Areas which are shown on **8.35 Landscape compensation, offsetting and enhancement area plans [REP7-535]**, ensuring that funding is targeted towards areas affected by the Scheme. • Long-term stewardship and maintenance - the Schedule expressly allows contributions to be applied towards carryout, maintaining and monitoring the landscape measures. • Adaptability over time - the criteria for the fund spend has been drafted to provide some flexibility for its application. Also, where funding remains unspent after ten years, the Schedule provides a mechanism for the relevant authority to propose revised landscape compensation, offsetting and enhancement measures, ensuring that funds can continue to address local needs and priorities while remaining consistent with the purpose of the fund. With regard to the Council's final comment that compensation funding should be additional to mitigation secured elsewhere through the DCO, the Fund is intended to complement, rather than replace or offset, landscape mitigation secured through the requirements and other provisions of the DCO.
N/A	Tendring District Council	*Strategic Environmental Delivery* TDC agrees that landscape compensation, enhancement and offsetting measures should be informed by strategic environmental priorities and opportunities to strengthen	The Applicant notes the Council's comments and considers the drafting of Schedule 20 will support both local environmental benefits and wider environmental enhancement objectives,

Examination Library ID	Name	Matter	Applicant Comment
		landscape character, ecological connectivity, green infrastructure networks and long-term environmental resilience. TDC considers that compensation measures should be targeted to deliver tangible benefits within the communities most affected by the project and should contribute towards wider environmental enhancement objectives across Tendring.	while retaining appropriate flexibility for the relevant authority to respond to evolving local priorities over the lifetime of the fund.
N/A	Tendring District Council	*Need for Stronger Commitments* TDC recognises that the Applicant has now acknowledged the principle of landscape compensation. However, TDC remains concerned that the commitments proposed remain insufficiently certain and have emerged only following sustained requests from local authorities throughout the Examination. TDC considers that the significant landscape impacts associated with the project justify a robust and enforceable landscape compensation package In TDC's view, any landscape compensation mechanism should be secured through binding DCO requirements and should not be dependent upon future discretionary decisions or uncertain delivery arrangements. TDC therefore supports securing a strengthened landscape compensation framework that provides clear obligations regarding funding, governance, implementation, monitoring and reporting..	The Applicant does not consider that further strengthening is necessary. The proposed Landscape Compensation, Offsetting and Enhancement Fund is secured through Schedule 20 within **3.1 Draft DCO [Revision H]**, with provisions relating to funding, permitted uses of contributions, governance, accounting records, monitoring, annual reporting, unspent funds and dispute resolution. The Applicant considers the proposed mechanism provides a robust and enforceable framework for the delivery of landscape compensation, enhancement and offsetting measures, with sufficient certainty while retaining appropriate flexibility for the relevant authorities to determine locally appropriate projects within the defined compensation areas. Schedule 20 has been included on a 'blue pencil' basis, and it will ultimately be for the Secretary of State to determine whether the commitment is necessary and meets the relevant tests.
N/A	Tendring District Council	*Conclusion* Tendring District Council maintains significant concerns regarding the outstanding matters identified within the CTMP and considers that stronger and more prescriptive controls are required before adequate confidence can be provided that construction impacts will be effectively managed. TDC formally endorses and defers to the technical evidence and representations submitted by Essex County Council on matters relating to highways, traffic, archaeology, ecology, DCO drafting, technical working groups and associated statutory functions. In relation to landscape and visual impacts, TDC considers that the Applicant's proposed compensation approach represents a positive step; however, considerably stronger commitments, greater certainty of delivery and robust DCO-secured mechanisms remain necessary. TDC respectfully requests that the Examining Authority and Secretary of State give substantial weight to the concerns set out above, together with ECC's detailed technical submissions at Deadline 7 and throughout the Examination.	The Applicant notes these concerns and comments and has responded within this document.
REP7-575	Thurrock Council	*Comments on Outline Landscape and Ecological Management Plan (OLEMP) [REP6-084]* 1.1 The Council notes that there no relevant changes within the following sections; Statutory Designated Sites, Non-Statutory Designated Sites that are within Thurrock Councils area and as such have no comment on these sections. 1.2 Roosting Bats 1.2.1 We consider the ratio of 10 trees with PRFs felled to 1 box to lost to be too low. We note that other NSIPs such as Sizewell A46 Newark Bypass and Lower Thames Crossing commit to a much higher ratio. We would expect a ratio closer to 4:1 with this getting closer to 1:1 for PRF-M trees.	1.2.1 The Applicant maintains its position that a provision of bat boxes/veteranisation equating to 10 % of the potential roosting features lost, is sufficient given the amount of other available roosting habitat in the wider area and the replacement planting to be undertaken, as justified within **8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533]**. This provision is on top of specific mitigation for any confirmed bat roost to be impacted by the Project. The commitment to the provision of bat boxes/veteranisation equating to 10 % of potential roosting features lost is agreed with the majority of other stakeholders and included within **7.4 Outline Landscape and Ecological Management Plan [REP7-342].** 1.2.2 The factors considered with respect to the location of bat boxes and veteranised features are set out in a set of bullet points below paragraph 6.1.14 in **7.4 Outline Landscape and Ecological Management Plan [REP7-342]**. The features would be

Examination Library ID	Name	Matter	Applicant Comment
		1.2.2 We would also welcome a commitment to try and ensure compensation features (boxes or veteranisation) will be distributed across the Project (Sections A – H) to reflect the trees lost in each section as closely as possible. This will ensure roost features are maintained near to their commuting and foraging habitats. 1.2.3 We would also expect that while as set out "A range of different compensation features (including box types/ veteranised features) should be used in different locations/aspects" the compensation features should also be selected taking note of the type of features lost and the bat species present in the area to ensure they are suitable for the area. 1.2.4 Regarding reptile mitigation we agree with the inclusion of date range for works being added and the caveat of suitable weather conditions. 1.3 Approach for Ancient Woodland 1.3.1 On point 7.5.10 we would like to see the text from the Ancient Woodland and Veteran Tree Strategy included confirming the compensatory replanting is adjacent to the Rainbow Wood as the connectivity and retaining planting in Thurrock is an important point. 1.4 Approach for Veteran Trees 1.4.1 We accept the inclusion of the "compensation ratio of 30:1 for any removal of veteran trees" and that this is in line with current industry standards and the commitment to retain, where possible, the stumps of veteran trees. 1.5 General Approach 1.5.1 The Council welcomes the commitment for ecological advice on decisions regarding replacement features and the commitment for reporting to the Ecology and Landscape Working Group. 1.6 Land Around Tilbury North Substation and Tilbury North (YYJ) CSE Compound – Landscape Proposals 1.6.1 All additional planting around the Tilbury North Substation is welcomed and encouraged. 1.7 Ecology and Landscape Working Group 1.7.1 We welcome the group being expanded to include landscape given the interaction between these disciplines. We appreciate the commitment to provide details on ECoW to the group to ensure suitability although would welcome the ability to feedback on the suitability if deemed necessary.	distributed across the Project (Sections A to H) and will consider the type of features lost, location and proximity to suitable commuting and foraging habitats. 1.2.3 A range of compensation features would be provided as identified in the nineth bullet point below paragraph 6.1.14 in **7.4 Outline Landscape and Ecological Management Plan [REP7-342].** 1.2.4 The Applicant welcomes Thurrock Council's agreement to the minor wording amendment for reptiles, within the **7.4 Outline Landscape and Ecological Management Plan [REP7-342]**. 1.3 Drawing number 12055-car-XX-XX-DR-L-0012 in **7.4 Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals [REP7-350]** shows the location of this planting next to the retained Rainbow Wood. 1.4 The Applicant welcomes Thurrock Council's agreement to the veteran tree compensation ratio. 1.5 The Applicant welcomes Thurrock Council's support for the Ecology and Landscape Working Group. 1.6 The Applicant welcomes Thurrock Council's support the Tilbury North Cable Sealing End Compound landscape planting plan. 1.7 The Applicant welcomes Thurrock Council's support for the Ecology and Landscape Working Group.
REP7-575	Thurrock Council	*Comments on Appendix B – Ancient Woodland and Veteran Tree Strategy [REP6-086]* 2.1 The only areas of ancient woodland/veteran trees within Thurrock impacted by these works are Rainbow Wood and Ashen Shaw as such our comments will only cover these two areas. 2.2 Neither of these areas are due to be affected by the Proposed Works and it is the mitigation areas from the LTC works that will be impacted. We welcome the new mitigation being adjacent to the Rainbow Wood to increase habitat connectivity. The updates to this report regarding Rainbow Wood and Ashen Shaw set out the responsible body for creation of this mitigation area. It is important that this is specified and assuming all parties we have no further comment.	The Applicant welcomes Thurrock Council's support on this matter.
REP7-575	Thurrock Council	*Comments on Environmental Statement (ES) Chapter 10 – Health and Wellbeing [REP6 053]*	The Applicant notes Thurrock Council's comments relating to residual health effects as a result of air pollution and dust emissions during construction being not significant with mitigation as set out in **7.2 Outline Code of Construction Practice [Revision H]**.

Examination Library ID	Name	Matter	Applicant Comment
		3.1 The Council agrees with the applicant's findings that significant residual health effects as a result of air pollution and dust emissions from the construction and use phases of the proposed development are unlikely when they are appropriately mitigated, as per the commitments within Chapter 7 of the ES and the Outline Code of Construction Practice (OCoCP). 3.2 The Council notes that proper implementation of the IAQM's guidance documents relating to the assessment and mitigation of dust emissions from demolition and construction should normally render residual impacts as "negligible". Use phase emissions of dust and air pollution are unlikely to be significant given the nature of the development.	The Applicant notes Thurrock Council's comments in relation to operational air quality impacts being negligible and not significant.
REP7-575	Thurrock Council	*Comments on updated Outline Code of Construction Practice (OCoCP) [REP6-072]* 4.1 Having considered National Grid's proposed working arrangements within 7.2 Outline Code of Construction Practice [REP6-073], the Council recommends that construction hours secured through any planning consent are aligned with Thurrock Council's established core construction hours. This would provide consistency with local practice and policy expectations whilst helping to protect nearby residents from unnecessary disturbance. 4.2 Where the applicant considers that works outside these core hours are necessary, these should be managed through the Section 61 prior consent process under the Control of Pollution Act 1974. This would enable out-of-hours activities to be justified on a case-by-case basis and require the applicant to demonstrate that Best Practicable Means (BPM) will be employed to minimise noise and disturbance. The Section 61 process also provides the Council with an appropriate level of oversight and allows any necessary controls, restrictions or mitigation measures to be tailored to the specific works proposed. 4.3 Whilst it is acknowledged that major infrastructure projects may occasionally require extended working hours, managing such exceptions through the Section 61 process represents a more proportionate and effective approach than establishing extended construction hours as the default position. 4.4 Section 6 – Mitigation Measures, Environmental Commitments and Monitoring, Commitment Reference T13 (To be confirmed by the Main Works Contractor(s) if project is consented, prior to construction) Table 6.1 details the following additional commitment: 'The Applicant will review the availability and suitability of the North Falls/Five Estuaries haul road for use by the Project during construction. The review will consider whether the haul road is operational, available at the required time, capable of accommodating the proposed construction traffic and can be utilised without adversely affecting the delivery of either project. Where the review identifies that use of the haul road is reasonably practicable and feasible, the Applicant will incorporate its use within the final Construction Traffic Management Plan'. Through a review of the OCTMP Rev E, it is noted that the Applicant has undertaken consultation with North Falls and Five Estuaries and has committed to do so with respect to the use of a temporary construction haul road located adjacent to the proposed East Anglia Connection Node (EACN) Substation, between Bentley Road and Ardleigh Road to provide temporary construction access to the sub-station site. Summary and Changes to Thurrock Council's Statement of Common Ground Position 4.4.1 Thurrock Council welcome the additional commitment and recommend that the Main Work Contractor(s) investigate opportunity to use shared temporary haul roads to minimise the impact of the proposed development. On review, this addition to the	The Applicant notes the comments regarding Section 61 applications for extended working hours. Commitment NV05 of **7.2 Outline Code of Construction Practice [Revision H]** requires the Main Works Contractor(s) to prepare detailed construction noise and vibration assessments, detailing methodologies, mitigation, working periods, and monitoring proposals, and submit these for approval by the relevant local planning authority prior to the start of works. This process ensures sufficient oversight by the relevant local planning authority for all works. Additionally, where works are predicted to exceed the relevant BS 522-1 'ABC' threshold during any period of works, commitment NV03 of **7.2 Outline Code of Construction Practice [Revision H]** requires that such works are subject to Section 61 applications through consultation with the relevant local planning authority. This approach is to ensure that: • there is sufficient oversight for all works by the relevant planning authority; • 'noisy' works close to sensitive receptors are sufficiently controlled through agreement of the contractors' assessment and associated control measures, and through Section 61 applications, where required; and • works which would not cause a potential significant adverse effect from noise and vibration (identified and agreed via the contractors' assessments) are not unreasonably restricted (e.g. works which do not generate notable levels of noise or vibration, or/and works located away from sensitive areas). The Applicant has set out its final position on construction working hours in **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**. The Applicant considers that the proposed hours represent the assessed worst case, not routine practice, and that flexibility across the full envelope is necessary to protect programme certainty without displacing the mitigation safeguards.

Examination Library ID	Name	Matter	Applicant Comment
		OCoCP Revision F results in no changes to Thurrock Council's position within the SoCG. Therefore, SoCG Environmental Impact Assessment (EIA) - Embedded, Standard and Additional Mitigation Measures, Item 3.10.19 Embedded Mitigation remains 'Under Discussion'.	
REP7-575	Thurrock Council	*Comments on OCoCP Appendix E – Community Engagement and Public Information [REP6-078] and Appendix F - Outline Noise and Vibration Management [REP6-080]* 5.1 In relation to Appendix E, the Council considers that the revisions adequately address the concerns previously raised regarding community engagement and the handling of complaints. The Council welcomes the inclusion of a requirement for a more detailed complaints procedure to be developed and submitted to the relevant local authority for review. This will provide an opportunity to ensure that appropriate systems are in place for the receipt, investigation, recording and resolution of complaints during the construction phase. 5.2 The Council would only suggest that the wording related to the EMF helpline be strengthened to include the information that was shared by National Grid in an email dated 10/06/2026, and in particular the sentence highlighted in bold at the end of the second paragraph. Namely: "The EMF Helpline number is an answer phone service, where callers leave their details and a member of the team will call the enquirer back to discuss the issue between 9am and 5 pm weekdays. The SLA is 3 working days currently, although most calls are responded to on the same day (excluding weekends). However, calls, emails and letters can be received 24 hours a day, 7 days a week. The same time frames for response would apply to emails and letters. The purpose of the helpline is to answer any concerns that members of the public may have regarding EMFs. The service is run by EMF Specialists within National Grid, who can provide details of EMF exposures at specific properties, and have knowledge of the science and policies regarding EMF. As the helpline has been in operation for over a decade, the team have a great deal of experience dealing with questions and concerns about a range of EMF topics. Where particular concerns arise, for residents close to National Grid assets, we can offer home visits and perform on site measurements." 5.3 In relation to Appendix F, the Council notes that the document has been updated to provide additional detail regarding the proposed noise and vibration monitoring procedures and management measures. 5.4 Following review of the updated document, the proposed noise monitoring approach is now considered suitable and adequately addresses the concerns previously raised by the Council. It is acknowledged that further detail regarding specific monitoring requirements, methodologies and monitoring locations will be developed through the detailed assessments undertaken for individual works and construction phases. 5.5 The Council welcomes the commitment that detailed monitoring proposals will be submitted to the relevant local authority for review and approval, ensuring that appropriate monitoring and mitigation measures can be agreed prior to the commencement of relevant activities. 5.6 The approach proposed in relation to Section 61 consents is also considered acceptable. The Section 61 process will provide an additional mechanism for the assessment and control of construction noise and vibration impacts, enabling the relevant local authority to review and comment on proposed working methods, mitigation measures and predicted effects as part of the consent process.	5.1. The Applicant welcomes Thurrock Council's agreement on the amendments made to this document. 5.2 The Applicant has updated **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]** at Deadline 8 to include details relating to the EMF helpline. 5.3 to 5.6. The Applicant welcomes Thurrock Council's agreement on the amendments made to this document. 5.7 Noted.

Examination Library ID	Name	Matter	Applicant Comment
		5.7 On this basis, Thurrock Council is satisfied that sufficient mechanisms are in place to secure appropriate community engagement, complaints management, and noise and vibration monitoring, assessment and mitigation throughout the construction phase.	
REP7-575	Thurrock Council	*Comments on Outline Construction Traffic Management Plan (OCTMP) [REP6-082]* 6.1 Section 2.3 – Working Hours, para 2.3.5 – two instances where a Primary Access Route (PAR) 'goes directly past a school (Freeman Primary School (Stow Upland) and Margaretting Church of England Primary School (Margaretting). At these locations, Heavy Goods Vehicles (HGV) will travel outside of the weekday school dropoff/ pick up times'. 6.1.1 Summary and Changes to Thurrock Council's Statement of Common Ground Position Thurrock Council note the Applicant's recognition of the location of the two schools on the local road network which will be subject to construction traffic. Thurrock Council fully expected the Applicant to ensure that the location of these two schools to be included within the final CTMP the Drivers Welcome Pack to ensure that the construction vehicles will adhere to the agreed travel times (outside of weekday school drop off/ pick up times).	The Applicant has detailed in Section 6.2.13 of **7.3 Outline Construction Traffic Management Plan [Revision G]** that the driver information pack will include details of school routes, where an increase in pedestrians may be noted. This is supported, where deemed necessary, through the re-timing of construction vehicles outside school pick up and drop off times. The Main Works Contractor(s) is committed to the restrictions outside of the schools, and this will be managed through the booking and scheduling system detailed in Section 5.4.9 of **7.3 Outline Construction Traffic Management Plan [Revision G]**.
REP7-575	Thurrock Council	6.2 Section 3.3 – Community Engagement and Public Information, para 3.3.3 – 'The name and contact details for the Project will be displayed at the entrance to each site compound. This will include an emergency telephone number. Details of the works, including contact details, will be provided to the relevant community groups, such as local parish councils, local highway authorities, and landowners before work commences. In the instance this number may be updated throughout construction, the contact details at each site entrance will be updated and circulated to the local parish councils, local highway authorities and landowners.' Section 3.3 – Community Engagement and Public Information, para 3.3.4 – 'A freephone Project helpline and Project website will be maintained by the National Grid community relations team. The Project helpline and website information will be visible on boards placed in appropriate locations where they will be visible to the public. The telephone number and Project website details will be provided to the relevant local authorities and other relevant parties. This will be updated in the instance of contact details changing throughout the project construction'. Summary and Changes to Thurrock Council's Statement of Common Ground Position 6.2.1 Thurrock Council welcome the additional commitment to maintain communications through the life of the construction programme and update stakeholder and public information as appropriate. 6.2.2 Thurrock Council's position, SoCG Outline Construction Traffic Management Plan (CTMP) – Item 3.10.33 Project Team Roles and Responsibilities remains 'Agreed' subject to the commitments as understood by Thurrock Council as detailed in the two bullet points shown in Thurrock Council's Position within the SoCG, Item 3.10.33.	The Applicant welcomes the update and agreement from Thurrock Council on the Community Engagement and Public Information.
REP7-575	Thurrock Council	6.3 Section 5.4 – Construction Traffic – General Construction Routeing Strategy, Multi Modal Routing, para 5.4.12 – noted additional commentary: 'The Main Works Contractor(s) will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items. The contractor will review and discuss ways of reducing freight by road with each Local Highway Authority, with a coordinated approach where feasible and practicable. This will include (but not restricted to): • Consolidation centres	The Applicant welcomes Thurrock Council's response and notes that there has been no change in the Statement of Common Ground (SoCG) position in relation to the Construction Routing Strategy. The Applicant has provided additional information to support the selection of the proposed Primary Access Routes and welcomes Thurrock Council's agreement, in principle, with the overall construction strategy, including the use of haul roads and Primary Access Routes. The Applicant notes that agreement is subject to the acceptance of the proposed Primary

Examination Library ID	Name	Matter	Applicant Comment
		• Wider considerations of the Multi-Modal Strategy using rail and port facilities to replace long distance road freight • Review of “just in time” scenario (Scenario 2), set out in Appendix G of the Transport Assessment Summary and Changes to Thurrock Council’s Statement of Common Ground Position 6.3.1 Thurrock Council welcome the commitment of the Main Works Contractor(s) to explore options of alternative transport modes to deliver materials and large and/or heavy items and would expect this to be included within the final CTMP. Additionally, where relevant, the Applicant/ Mains Works Contractor(s) to advise Thurrock Council and/or any relevant stakeholders as appropriate. 6.3.2 Thurrock Council’s position, SoCG Outline Construction Traffic Management Plan (CTMP) – Item 3.10.8 Primary Access Routes remains ‘Under Discussion’ subject to the review of information requested and provided by the Applicant on 10 and 13 July 2026. This matter is subject to Thurrock Council’s review of and satisfaction with the requested information. Thurrock Council is committed to continue discussions with the Applicant, which will likely conclude after the finalisation of this statement of common ground. 6.3.3 Thurrock Council’s position, SoCG Abnormal Indivisible Load (AIL) Access – Item 3.10.49 Abnormal Indivisible Load (AIL) Access Approach remains ‘Agreed’.	Access Routes within Thurrock and looks forward to continuing engagement with the Council to resolve this matter post consent.
REP7-575	Thurrock Council	6.4 Section 5.9 – Highway Mitigation Measures – para 5.9.9 - Section 6 of the Transport Assessment (Document Number 7.11) outlines the approach to assessing the impact of background traffic growth plus committed development plus Project construction flows during the AM and PM peak. As a result of this assessment a number of junctions have been identified for requiring further mitigation during the construction period – these are listed in Table 5.10. The Main Works Contractor(s) will be responsible for ensuring these measures are enforced. Table 5.10 also includes junctions on the highway network where temporary or permanent mitigation has not been identified due to the anticipated limited impact of the Project construction traffic. Section 5.9 Highway Mitigation Measures, para 5.9.10 – For these junctions, the Main Works Contractor(s) will develop a monitoring and mitigation framework which will include the proposed details of monitoring of the junctions and additional temporary and proportionate mitigation measures that be implemented during construction, where (trigger points) are met or are predicted to be met, including re timing vehicles away from peak hours, shared mobility (transport), additional traffic management and signage, and signal optimisation. This framework will be agreed with the relevant Local Highway Authority or National Highways in relation to SRN junctions and will be included within the final CTMP. To support the framework, additional proportionate measures may be discussed with the relevant Local Highway Authority, to explore suitable mitigation. Summary and Changes to Thurrock Council’s Statement of Common Ground Position 6.4.1 The Applicant issued information requested by Thurrock Council on 10 and 13 July 2026. Thurrock Council is currently reviewing this information. This matter is subject to Thurrock Council’s review of and satisfaction with the requested information. Thurrock Council is committed to continue discussions with the Applicant, which will likely conclude after the finalisation of this statement of common ground.	The Applicant notes that all requested information has been received by Thurrock Council. The Applicant will continue to discuss any concerns with Thurrock Council during detailed design and will include any required updates within the final CTMP.
REP7-575	Thurrock Council	6.5 Section 6 Implementation, Table 6.1 – Site Checks Relevant to the CTMP – Note amendment to the following:	Section 6.4 of **7.3 Outline Construction Traffic Management Plan [Revision G]** includes HGV drivers not adhering to agreed routes, without reasonable excuse as non-compliance which would be investigated further. Muckingford Road is a designated LGV route, and with the monitoring systems, should not be used by HGVs associated with the Project. The

Examination Library ID	Name	Matter	Applicant Comment
		• Inspection Type: Monitoring of Vehicles and Road Network/ Purpose: Checking signage is in place. Monitoring of vehicle condition and use of agreed construction routes. Monitoring of construction HGV vehicles movements Summary and Changes to Thurrock Council's Statement of Common Ground Position 6.5.1 Thurrock Council's position, SoCG Item 3.10.47 – Primary Access Route on Muckingford Road – The Applicant is to ensure that only LGV construction traffic uses Muckingford Road. It is fully expected that the Applicant ensures that the use of Muckingford Road is monitored through the life of the CTMP, and where noncompliance is recorded, appropriate enforcement actions, mitigation and sanctions are applied. These instances will be recorded within the CTMP and conveyed to Thurrock Council as appropriate. 6.5.2 Thurrock Council's position, SoCG Item 3.10.47 is 'agreed' on the principle that use of Muckingford Road by construction vehicles (staff or deliveries) is monitored. On this basis, Thurrock Council consider the removal of 'vehicles' and replacement with 'HGV' to be inappropriate.	CTMP change from vehicles to HGVs is targeted at the movements of the HGVs in terms of numbers. The site checks detail the "monitoring of vehicle condition and use of agreed construction routes", which captures the types of vehicles on each construction route. The Applicant considers that these measures are acceptable to monitor the use of Muckingford Road by construction vehicles.
REP7-577	Water Management Alliance	The attached document is the Water Management Alliance's preferred Protective Provisions, as agreed with the Applicant. The Protective Provisions are approved by Water Management Alliance subject to correction of paragraph numbering (final paragraph should be paragraph 11, not 12). *The IP provides a summary of the outstanding matters and changes that the Water Management Alliance are seeking. The IP's preferred amendments have not been reproduced. Applicant note: Water Management Alliance submitted their preferred Protective Provisions. These are not repeated here and can be found in REP7-577]*	The agreed Protective Provisions are included in Part 15 of Schedule 16 of the **3.1 Draft DCO [Revision H]**.

Appendix A. Applicant's Comments on Responses to the Report on the Information for European Sites

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Appendix A
Applicant's Comments on Responses to the Report on the Information for European Sites

A.1.1 On 7 July 2026, Report on Implications for European Sites (RIES) **[PD-030]** was published with questions directed the Applicant and other parties. Responses to questions directed at the Applicant are provided in **8.33 Comments on the RIES and Responses to any Associated Questions [REP7-534]**. This Appendix comments on responses to the report from other parties.

Table A.1 Applicant's Comments on Responses to the Report on the Information for European Sites

Matter	Name / Examination Library ID	Interested Party Response	NG Response
General	Natural England	Natural England notes that no questions have been specifically addressed to us in the Report on the Implications for European Sites and confirms that it broadly reflects our position. We offer this advice without prejudice to the representations of other parties.	Noted.
*RIES Q1 and Q2 directed to the Applicant, please see **8.33 Comments on the RIES and Responses to any Associated Questions [REP7-534]**.*			
RIES Q3 – to South Norfolk District Council. Can South Norfolk District Council confirm it is content with the position of the applicant and NE that there will be no adverse effects on the integrity of the Norfolk Valley Fens SAC? If not, please explain your outstanding concerns. If South Norfolk District Council has remaining concerns, please clearly set out specific actions it considers should be undertaken by the applicant to resolve its concerns.	South Norfolk District Council	South Norfolk District Council did not provide a response to this in their Deadline 7 submission **[REP7-571]**.	
RIES Q4 to EWT – please confirm if further engagement has taken place and if the concerns of EWT regarding the approach to the assessment of FLL for the Stour and Orwell Estuaries SPA and the Thames Estuary and Marshes SPA will be resolved by D7. If EWT has remaining concerns, please clearly set out specific actions it considers should be undertaken by the applicant to resolve its concerns.	Essex Wildlife Trust	Essex Wildlife Trust did not make a submission at Deadline 7	

Appendix B. Applicant's Comments on Suffolk County Council submission 'Comments on Submissions received at Deadline 6' [REP7-573]

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Appendix B
Applicant's Comments on Suffolk County Council submission 'Comments on Submissions received at Deadline 6' [REP7-573]

B.1.1 This Appendix provides a response to Suffolk County Council's Deadline 7 submission REP7-573 which provides comments on various Deadline 6 documents in a tabular form.

B.1.2 Applicant Note: Where SCC has 'noted' a matter and the Applicant has no further comment, this is not included in the table for ease of reading. As such, 'Table Item' numbering may not include all sequential numbers.

Table B.1 3.1 (F) Draft DCO [REP6-031]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
1.1	Archaeology	Schedule 3, Requirement 5 (Archaeology)	Please refer to Table 1, Item 1.1, of SCC's comments on the submissions received at Deadline 5 [REP6-167], which sets out SCCAS's comments on the current wording of Requirement 5.	The Applicant responded to SCC's comments in Appendix G of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**.
1.2	Landscape	Schedule 3, Requirement 9 (Reinstatement planting plan)	Paragraph (8): the off-site planting scheme needs to not only be submitted to but also approved by the relevant planning authority. Paragraph (9): the off-site planting delivery scheme needs to be also in accordance with the final LEMP(s) is so far as it needs to provide the same standards for implementation and aftercare.	Requirement 9(8) of **3.1 Draft DCO [Revision H]** had been updated at Deadline 7 to include the need for the Offsite Planting Delivery Scheme to be approved by the relevant LPA. The inclusion of wording within Requirement 9 to require the Offsite Planting Delivery Scheme to be in accordance with **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** (LEMP) is not considered appropriate. The Offsite Planting Delivery Scheme is a standalone document to be prepared in accordance with the Outline Offsite Planting Delivery Scheme and will be subject to appropriate management provisions. The Applicant also refers the Council to the Applicant's response to 6.6 in **8.31 Response to Rule 17 Letter received 14 July 2026 [REP7-533]**.
1.3	Landscape	Schedule 3, Requirement 12 (Design of permanent buildings and link pillars)	SCC considers that paragraph (4) should include planting proposals to help integrate the link pillars into the landscape.	The Applicant considers that it would not be appropriate or proportionate to require planting proposals to assist in integrating all link pillars into the landscape. However, the Applicant will give due consideration to feedback arising from the design review process as set out in **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]**. Where appropriate, the design will be refined in response to that feedback, which may include consideration of planting proposals where these are considered appropriate to the location and circumstances of link pillars, provided that any changes remain consistent with the approved design principles, sympathetic and in keeping with landscape character and landcover and compatible with applicable technical, environmental, operational, engineering and safety requirements.
1.4	Skills, Education and Employment	Schedule 3, Requirement 15 (Employment and Skills Plan)	SCC notes that no substantive amendments have been made to Requirement 15 since SCC's comments on submissions received at Deadline 5 [REP6-167]. Therefore, SCC's position remains unchanged. SCC continues to support the principle of securing a Final Employment and Skills Plan ("ESP") through Requirement 15. However, SCC remains concerned that the Requirement, as currently drafted, does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the Project's socio-	The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained within NPS EN-1, specifically paragraph 5.13.12. The Applicant responded to SCC's comments in REP6-167 in Appendix G of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481].** Requirement 15 of **3.1 Draft DCO [Revision H]** had therefore been amended at Deadline 7 to include for the prior approval of the Final

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
			economic impacts and delivering meaningful skills, employment and supply chain outcomes. In particular, SCC maintains that submission of the ESP alone is insufficient and that the Requirement should secure approval of the Final ESP by the relevant local authorities prior to commencement. Approval is necessary to ensure that the ESP is supported by a robust assessment of workforce and supply chain demand, contains clearly defined interventions, monitoring and reporting arrangements, and aligns with established governance structures, including the Regional Skills Coordination Function ("RSCF"). SCC also maintains its concerns regarding the use of the terms "substantially in accordance with" and "general accordance". In the absence of greater detail within the Outline ESP, these terms introduce uncertainty as to how compliance will be assessed and risk allowing commitments to be diluted at the post-consent stage. For the reasons set out in SCC's previous submissions, including the continued absence of clear linkages between workforce and supply chain demand an proposed interventions, the lack of defined targets and monitoring arrangements, and the deferral of key elements to the post-consent stage, SCC considers that Requirement 15 should be strengthened to require written approval of the ESP by the relevant local authorities before commencement and to provide greater certainty regarding compliance, monitoring and ongoing review.	Employment and Skills Plan by the relevant county planning authority and Thurrock Council. The scope of **8.13 Outline Employment and Skills Plan [REP7-489]** as submitted at Deadline 7 is considered to be sufficiently comprehensive and appropriate given its intended objective and status as an outline document. It is important that the Final ESP remains in substantial accordance with this scope.

Table B.2 3.5 (E) Schedule of Changes to the Draft DCO [REP6-035]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
2.1	Legal	General	Appendix A details SCC's comments on [REP6-035]. *[Applicant note: Appendix A included in the original comments document REP7-573 has been reproduced here in table format for ease of reading]* Background Table 2.5 (Schedule of Changes to Version E of the draft DCO [REP5-060]) of the Applicant's deadline 6 document Schedule of Changes to the Draft DCO [REP6-035] sets out the main changes made by the Applicant to the draft DCO and which are included in deadline 6 draft DCO [REP6-031]. SCC would comment on the following changes which concern the DESNZ unit, the "white land", the removal of human remains (art. 23), trees, and BNG – DESNZ unit Rows 5, 11, 44, 54, 57 and 72 of Table 2.5 concern the proposed DESNZ unit. SCC's position in respect of how the DESNZ unit should operate is set out in its response to agenda item 5.2.b (Schedule 4 (discharge of requirements)) of its Written Summary of Representations made at Issue Specific Hearing 3 ("ISH3") [REP6-166] (page 13 of 37 to page 15 of 37). SCC's proposed article, which would enable the Secretary of State to call in any application to discharge a requirement, is set out in the reply to Action Point 9 (pages 16 to 18 of 37 of the same document). SCC maintains its position in respect of the DESNZ unit. Notwithstanding SCC's opposition to an applicant being able to choose to whom an applicant for a discharge of a requirement should be made, in sub-paragraph (a), after "the undertaker's discretion" the word "to" is needed.	The Applicant's proposed approach to the DESNZ unit is set out in detail in Appendix A (Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury) to its **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** and is addressed further in the Draft DCO section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**. The Applicant does not accept SCC's proposed modifications and maintains its position as set out in those documents and summarised at a high level as follows: The Government has accepted Recommendation 30 of the Fingleton Review and committed to establishing the DESNZ unit to "speed up decisions on the meeting of post-consent requirements". The Applicant's drafting gives the undertaker a case-by-case election because the unit's operational framework has not yet been published. The relevant local planning authority is a consultee in every case where the unit acts, preserving local expertise and community accountability, with drafting providing for cost recovery. SCC's proposed call-in model would constrain how the unit can operate before it is established. There is no legal reason why the DESNZ unit mechanism must sit in an article rather than in Schedule 4. Paragraphs (2) – (4) of Article 55 (Procedure regarding certain approvals etc.) expressly give Schedule 4 effect (in the standard form manner of all DCOs in relation to their schedules). The DESNZ unit mechanism is procedural in character, determining who is to be the approving body for the purposes of Requirement discharges and how that body must consult. Schedule 4 is the natural as well as appropriate legal place for such subject matter to sit within the DCO. The Examination has covered timings for decisions at great length and the Applicant maintains that the timings proposed in Schedule 4 of **3.1 Draft DCO [Revision H]** are proportionate and appropriate for a project of critical national priority such as the Project. The Applicant is committed to pre-application engagement and the draft Order provides mechanisms that allow further flexibility, including with the agreement of the Applicant. The Applicant does not consider there to be any justification for extending the baseline timescales, noting the scope for flexibility and the risk of additional constraints and costs in the event of delay to the delivery of the Project. The Applicant disagrees that the word "to" needs adding to paragraph 1(1)(a). The "to" is immediately before the words "either, at the undertaker's discretion".
Appendix A			"White land" Rows 9 and 15 of Table 2.5 concern the "white land". On 24 June 2026, SCC provided details to the Applicant of the work it has undertaken comparing differing approaches across different DCOs regarding to the drafting of "Order land". While the drafting suggested in rows 9 and 15 is novel and, so far as SCC is aware, unprecedented in DCOs, SCC considers the drafting works.	The Applicant notes SCC's conclusion that the Revision F drafting in respect of the treatment of "white land" is effective, and no further action is therefore required in this regard.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
Appendix A			Removal of human remains (article 23) The addition of the text after article 23(13)(c) (as set out in row 27 of Table 2.5) is an improvement on the previous drafting; however, the drafting cross-refers to the written scheme of investigation approved under requirement 5 (archaeology). SCC maintains its concerns in respect of that requirement, as most recently set out at agenda item 5.2.a.i of its Written Summary of Representations made at Issue Specific Hearing 3 ("ISH3") [REP6-166] (page 9 to 12 of 37).	The Applicant understands from SCC's comment that that is not a freestanding concern about the structure, scope or appropriateness of Article 23 (Removal of human remains) in the draft DCO but about Requirement 5 (Archaeology) to which Articles 23(12) and (13) cross-refer, arguing for detailed written schemes of investigation prior to pre-commencement operations. Those concerns about Requirement 5 (Archaeology) are addressed in the Historic Environment section of **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement**, which in summary identifies that a blanket requirement, where archaeological risk is not consistent across the board, is neither reasonable nor proportionate and would catch any breaking of ground, however minor; the Sea Link Project has specifically different archaeological potential (including the shoreline) and has a very different profile in terms of scale and delivery programme; Requirement 5 already ensures appropriate protections are in place for pre-commencement works reasonably expected to affect archaeology; and Historic England has confirmed it is satisfied with the revised Requirement 5 drafting. In any event, article 23(13) requires the undertaker both to comply with any applicable terms of a relevant written scheme of investigation approved under Requirement 5 and, independently, to apply for and act upon a direction from the Secretary of State as to the treatment of any remains more than 100 years old prior to, during and after removal. That direction is not confined to the terms of any such written scheme of investigation and the Secretary of State may direct as they deem fit on any matter relevant to the treatment of the remains, providing a broad and independent backstop whatever the position under Requirement 5 or the presence or absence of a relevant written scheme of investigation.
Appendix A			Trees Rows 42 and 43 of Table 2.5 concern the amendments made to articles 50 (felling or lopping) and 51 (trees subject to tree preservation orders). SCC welcomes these amendments; however, these do no go far enough. SCC raised wider points regarding article 50 in its Comments on Submissions received at Deadline 3 [REP4-335] (paragraph 2.3: page 10 of 100) and its Post-hearing submission for Issue Specific Hearing 2 [REP4-336] (page 15 of 43). SCC maintains its position as set out in those documents.	The Applicant understands from SCC's comment that it is content with the ancient/veteran tree carve-outs added to articles 50(11) (Felling or lopping) and 51(6) (Trees subject to Tree Preservation Orders) in Revision F of the draft DCO but maintains its position on Article 50 (Felling or lopping) more generally as per the cross-references to its existing representations (which it is understood relate primarily to concerns about hedgerows and important hedgerows). Paragraph 3.54 of **3.2 Explanatory Memorandum [REP7-066]** and **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement** set out the Applicant's position in relation to Article 50 (Felling or lopping). Article 50 is a well-trodden provision in the DCO regime permitting the undertaker to fell, lop, prune, cut, trim, coppice, pollard or reduce in height or width any hedgerow or important hedgerow subject to the in-built safeguards that this is only where it reasonably believes it necessary to prevent obstruction or interference with the construction, maintenance or operation of the authorised development, or a danger to persons carrying out those activities. However, Article 50 should not be read in isolation. That power operates alongside Requirement 8, which requires that before any stage of the authorised development commences, a plan showing trees, groups of trees,

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
				woodlands and hedgerows to be retained and/or removed during that stage must be submitted to and approved by the relevant planning authority, and that plan must be in accordance with both **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** and **2.16 Trees and Hedgerows to be Removed and or Managed Plans [REP7-048 to REP7-062]**. The relevant planning authority therefore retains an appropriate role over what is retained and removed, within the parameters established during the Examination. The fundamental wider point goes to the heart of the approach of the DCO regime: **2.16 Trees and Hedgerows to be Removed and or Managed Plans [REP7-048 to REP7-062]** have been submitted as part of the application for the Project and been examined in detail by the Examining Authority with SCC's full participation as an important consultee. The principle of removal or management of hedgerows and trees is to be determined by the Secretary of State as part of the grant of the DCO, without the need for subsequent local authority consent under the Hedgerow Regulations. The disapplication of the Hedgerow Regulations in article 50(9) simply reflects the same principle that underlies regulation 6(1)(e) of those Regulations: where development has been authorised through a prior consenting process, the notification and retention notice regime serves no additional protective function. Regulation 6(1)(e) achieves this automatically where planning permission under the Town and Country Planning Act 1990 has been granted; article 50(9) achieves the same result for this Order, because a DCO is not a "planning permission" within the meaning of that Act and so the regulation 6(1)(e) exemption does not apply of its own force. There is therefore no need to further amend Article 50 (Felling or lopping).
Appendix A		Reinstatement planting plan Row 59 of Table 2.5 concerns the amendments made to requirement 9 (reinstatement planting plan). In new sub-paragraph (10)(a) additional provisions are required to state that trees will be replaced (i) on a like for like basis at a ratio of 3:1 (i.e. three replacement trees for each tree lost) or (ii) with locally appropriate species in accordance with the recommendations of a Suitably Qualified Arboriculturist and Ecologist who has determined that like for like replacement would be inappropriate in that specific case. In addition, Requirement 9 should include provision for periodic reporting to the local planning authority. Outside of the requirements, a mechanism needs to set out how the local planning authority's costs of monitoring the replanting regime will be paid.	The Applicant has included revised wording in paragraph 2.3.6 in **8.28 Outline Offsite Planting Delivery Scheme [Revision B]** submitted at Deadline 8 to address the Council's comments in relation to the planting species. The Applicant does not consider the inclusion of additional wording in Requirement 9 regarding reporting is necessary.
Appendix A		Biodiversity net gain Row 61 of Table 2.5 concerns the amendments made to requirement 11 (biodiversity net gain). Paragraph 1(1) includes definitions of the following terms: "biodiversity metric", "biodiversity offsetting scheme", "final biodiversity net gain assessment" and "interim biodiversity net gain assessment".	The Applicant does not consider it necessary to relocate the definitions. It is standard drafting practice for such terms to be defined within the interpretation provisions of the Order, and the Applicant considers the current drafting to be appropriate. No amendment is therefore proposed. The Applicant does not agree to the addition of the following wording *'(or such other biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body)'* to the

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
			Since these terms are used in Requirement 9 only, SCC would suggest the terms are relocated to Requirement 9 and are set out under current sub-paragraph (5). In addition, SCC considers the definition of "biodiversity metric" should be amended as follows – "means version 4.0 of the statutory biodiversity accounting tool published by the Department for the Environment, Food and Rural Affairs or Natural England that can be used to measure the biodiversity value or relative biodiversity value of habitat or habitat enhancement for the purposes of biodiversity net gain (or such other biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body); The additional words are included in the BNG requirements of several recently made DCOs and SCC consider it would be helpful if the words were included here also. Examples of recently made DCOs which include these words are: One Earth Solar Farm Order 2026 (requirement 9(2), (biodiversity net gain)); Dean Moor Solar Farm Order 2026 (SI 2026/754) (requirement 7(2), (landscape and ecological management plan)) and Fenwick Solar Farm Order 2026 (SI 2026/151) (requirement 8(2) (biodiversity net gain)). In addition, Requirement 11 should include provision for periodic reporting to the local planning authority. Outside of the requirements, a mechanism needs to set out how the local planning authority's costs of monitoring BNG will be paid.	"biodiversity metric" definition. The Applicant has committed to the use of version 4.0 of the statutory metric for all future BNG updates, not any future or previous versions, as used for the DCO application to date. Onsite habitat creation, enhancement and management will be secured through the Final Landscape and Ecological Management Plan(s) approved under Requirement 4 of **3.1 Draft DCO [Revision H]**. Offsite BNG will involve the purchasing of units from third party providers. Responsibility for the long-term monitoring and enforcement of the offsite BNG agreements will sit with the Responsible Body for the specific BNG sites. It is therefore not considered necessary or appropriate to amend the drafting of Requirement 11 to require periodic monitoring by LPAs as this has already been addressed where relevant.

Table B.3 6.11.A8 (A) Phase 2 Geophysical Survey [REP6-065]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
3.1	Archaeology	General Comment	SCCAS will contact the Applicant regarding the report's suitability for inclusion in the Suffolk Historic Environment Record. The report states that approximately 86% of the Phase 2 area has been subject to geophysical survey. The Applicant should state when the remaining areas will be surveyed or, where geophysical survey is not possible, explain how those areas will be archaeologically evaluated. SCCAS emphasises that the absence of magnetic anomalies should not be taken as evidence of an absence of archaeological remains. The geophysical survey interpretations, including any blank areas, must be 'ground-truthed' through trial trenching to inform a programme of archaeological mitigation for project impacts.	The Applicant no longer proposes to geophysically survey the outstanding 14% of the Phase 2 geophysical survey area. The Applicant does, however, commit to undertaking archaeological trial trenching (ATT) in these areas. The ATT will comprise a 5% sample of the outstanding areas, in line with SCCAS guidance, with the trench plans to be approved by the relevant LPA archaeological advisor. With regard to the second comment, the Applicant reiterates that 'blank' areas of geophysical survey in areas of Project impact will be tested by ATT as well as those areas with cropmarks, LiDAR responses, and geophysical anomalies.

Table B.4 6.11.F4 (C) Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [REP6-069]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comment
4.1	Archaeology	General Comment	This plan identifies the areas that have undergone priority evaluation, including priority geophysical survey and trial trenching. It also shows those areas where Phase 2 geophysical survey has been undertaken. SCCAS welcomes the submission of this plan as part of the Examination. Document 6.11.A8 Environmental Statement Appendix 11.8 – Phase 2 Geophysical Survey [REP6-065] states that approximately 86% of the Phase 2 area has been subject to geophysical survey. Figures in 6.11.F4 Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [REP6-069] indicate the unsurveyed areas, the applicant should state when these remaining areas will be surveyed or, where survey is not possible, how they will be archaeologically evaluated.	The Applicant refers to its comment at Item 3.1 above.

Table B.5 7.2 (F) Outline Code of Construction Practice [REP6-073]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
5.1	Archaeology	Table 6.1 Mitigation measures / environmental commitments H01 – H06	SCCAS welcome the amendments made to the historic environment commitments H01 – H06. There are no further comments for the versions of these commitments in [REP6-073].	The Applicant notes SCCAS' comments.
5.2	Archaeology	Table 6.1 Mitigation measures / environmental commitments GH12 "The provision of a drilling fluid breakout method statement, where horizontal directional drilling is proposed at trenchless locations, will be developed by the Main Works Contractor(s) and discussed with the Environment Agency, and will be informed by sufficient appropriate ground investigation and will include: • Detailed and appropriate design of all trenchless crossings including demonstration of a suitable drilling profile and depth to	Following the Applicant's comments in Document 8.4.14, Applicant's Comments on Any Further Information or Submissions Received at Deadline 5 [REP6-114], SCCAS notes that it is not seeking to establish a methodology within the OCoCP. SCCAS has therefore amended its request for an additional bullet point, which should serve as a signpost within commitment GH12 to the relevant methodological documents. SCCAS considers that Commitment GH12 should include, as a minimum, the following additional bullet point: "Drilling clay breakout in areas where archaeological remains are to be preserved in situ will be managed in accordance with a methodology defined in the OAMS-OWSI and relevant DWSI." This addition is requested to provide clarity for on-site engineers regarding the methodology to be followed when undertaking drilling clay breakout in archaeologically sensitive areas. It would also direct them to the documents setting out the appropriate methodology and any necessary remediation measures. SCCAS therefore maintains that this limited amendment would improve the clarity and usability of the commitment GH12 without creating any new or additional obligation for the Applicant.	The suggested bullet point was added to the Deadline 7 iteration **[REP7-322]** of **7.2 Outline Code of Construction Practice [Revision H].**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		mitigate the risk of breakout • Description of drilling procedure and demonstration of suitability, including removal of borehole cuttings during drilling • Annular pressure monitoring • Regular walkovers of the drill path to check for visible evidence of breakouts • Measures to limit the volume of the drilling fluid loss • Measures to contain the lost drilling fluid • Measures to remove the lost drilling fluid • Measures to seal the area of the breakout • Measures to provide any remediation, if appropriate • Assessment of the pollution potential of any additives required and a permit or exclusion obtained as required."		
5.3	Planning	Table 6.1 Mitigation measures / environmental commitments W23 "Where construction works are undertaken in proximity to watercourses with high sensitivity to water quality changes, regular visual monitoring for signs of water pollution would be undertaken by the Environmental Clerk of Works (ECoW), in particular during periods of	SCC (Planning) notes that the Environmental Clerk of Works is referred to by the abbreviation ECoW, however, the outline Landscape and Ecological Management Plan [REP6-085] states in its abbreviations section that the definition of ECoW is the Ecological Clerk of Works and uses EnvCoW to abbreviate the Environmental Clerk of Works. For consistency, SCC proposes that the abbreviation for the Environmental Clerk of Works in commitment W23 is amended to EnvCoW.	**7.2 Outline Code of Construction Practice [Revision H]** makes it clear that the Environmental Clerk of Works (EnvCoW) is responsible for monitoring water quality and not the Ecological Clerk of Works (EcOW).

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		heavy rainfall. If signs of water pollution were are detected the ECoW would use in-situ handheld devices to record key parameters and if pollution is confirmed, appropriate mitigation measures should be implemented to prevent further deterioration."		
5.4	Landscape	Table 6.1 Mitigation measures / environmental commitments GG34 "The Project has committed to moving specific pylons and restricting the movement of specific pylons or infrastructure along the longitudinal Limits of Deviation (LoD): • RG13 - restrict southerly movement due to buried archaeology found as part of the solar development • RG48 to RG49 – ensure the alignment following detailed design minimises the extent of vegetation management required, e.g. through increased pylon heights. Also restrict width of access and commit to using trackway instead of a stone haul road through the woodland in the Tas Valley • RG86 - restrict movement to the south to prevent physical impact to non-designated heritage asset Bush Hall (1013) • RG87 - restrict movement to the west to prevent physical	SCC's requests for tighter parameters regarding LoD for specific pylon towers (as outlined in its Action Point 7 of ISH4 in SCC's Post- Hearing Submission [REP6-166]) are not reflected in this commitment.	The Applicant responded in detail regarding the requests from SCC in **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP7-482]**, page 12-22, which set out the Applicant's position in general and for the specific locations identified by SCC.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		impact to non-designated heritage asset Bush Hall (1013) • RG164 and RG165 - restrict south west and north east movement to avoid impact to archaeological remains • RG181 to RG182 – maintain 30m separation to the fishing lakes from blown out conductors […]"		
5.5	Landscape	Table 6.1 Mitigation measures / environmental commitments LV03 "Construction lighting will be directional and minimised. See B06 for additional details."	Additional wording as discussed in recent meetings will need to be included at D7.	Commitment LV03 of **7.2 Outline Code of Construction Practice [Revision H]** has been updated to state: '*Construction lighting will be directional and minimised. Within and in proximity to Dedham Vale National Landscape, lighting will be designed and operated substantially in accordance with Dedham Vale National Landscape Lighting Design Guide, Guidance to reduce light pollution and protect our dark skies, July 2023. See B06 for additional details, in particular the design of lighting in line with joint guidance provided by the Institution of Lighting Professionals and Bat Conservation Trust (2023), which recommends a warm white light source (2,700 Kelvin or lower). This will minimise visual effects on people at night as well as habitats and species. LED luminaires will be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.* *Only luminaires with an upward light ratio of 0% and with good optical control should be used – following ILP Guidance for the Reduction of Obtrusive Light. Luminaires should feature peak wavelengths higher than 500 nanometers to avoid the component within LED lighting that can cause greater impact. Also see GG30, which includes provisions for people to raise any concerns or complaints about the project, including lighting.*'
5.6	Biodiversity	7.3 Ecology and Landscape Working Group	The wording provided by SCC, in regard to the formation of the Ecology and Landscape Working Group, at deadline 5 [REP5-270], provides additional detail. SCC sees no reason to deviate from this wording and therefore considers that that wording suggested in [REP5-270] should be included and secured in the oCoCP.	The text included within the **7.2 Outline Code of Construction Practice [Revision H]** and **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** on the remit of the Ecology and Landscape Working Group has been broadly aligned with the suggested wording from Suffolk County Council. The Applicant maintains its position that the amended wording on the Ecology and Landscape Working Group is appropriate and provides sufficient flexibility to allow for a range of discussions from for all parties.

Table B.6 7.3 (E) Outline Construction Traffic Management Plan [REP6-083]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
6.1	Landscape	Accesses and Crossover Points, 5.8.15	SCC welcomes that this commitment for traffic management has been extended from mature trees to now also include mature hedgerows.	This comment is noted.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
6.2	Highways	Enforcement, 6.4.1	SCC queries the three-month look ahead for HGV movements and how exceedances can be forecast	The three-month lookahead will assist in proactively identifying issues and allow time to identify any corrective actions where necessary. The Applicant has updated **7.3 Outline Construction Traffic Plan [Revision G]** section 5.4.21 to reflect additional detail on the three-month lookahead. The additional commitment states that should the three month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in **7.11 Transport Assessment [REP7-356]** and **16.4 Environmental Statement Appendix - Traffic and Transport Construction Effects [REP7-310],** the EnvCoW and Transport Coordinators will notify National Grid and the relevant local highway authority, and where appropriate National Highways. This commitment ensures that Suffolk County Council will be notified of any predicted exceedances. The predicted exceedances will be forecast using construction planning information and through the vehicle booking system, which will be developed by the Main Works Contractor(s) to schedules HGVs to site throughout the construction period.
6.3	Highways	HGV Deliveries, 5.4.19	SCC queries why "deliveries" has been removed from this paragraph	The Applicant adjusted the wording in section 5.4.19 in **7.3 Outline Construction Traffic Management Plan [Revision G]** to provide clarity that all HGVs to site will be booked using the scheduling system, not just those making 'deliveries'. The Applicant has provided additional clarity in **7.3 Outline Construction Traffic Management Plan [Revision G]** Section 5.4.14, detailing "HGV movements to site are intended to be deliveries, unless associated with material removal. HGVs will not remain on site from a delivery, as a result every delivery is a two-way movement." This was added following ongoing engagement with Suffolk County Council and captured within the Statement of Common Ground (**5.9.2 Signed Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) [REP7-096**]).

Table B.7 7.4 (F) Outline Landscape and Ecological Management Plan [REP6-085]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
7.1	Landscape	Executive Summary and 1.1.6	SCC welcomes the inclusion of pre-commencement works into the scope of the oLEMP but considers that therefore the final LEMPs need to be approved before the beginning of pre-commencement works.	The Applicant does not agree with Suffolk County Council's suggestion that the final LEMP should be approved before the beginning of any pre-commencement operations. **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** is designed to provide the necessary controls and protections for the pre-commencement operations, and these controls and protections are secured by Requirement 4. Requiring the approval of final documents prior to carrying out pre-commencement operations would delay the delivery programme and is unnecessary and disproportionate in the context of this Project where adequate protections are already woven into the outline management plans.
7.2	Landscape	Working near Trees and 7.2.1	There remain many unidentified trees and hedges within Figure A13.6.1 – Landscape and Visual Arboricultural Impacts Plan [REP1-065] and7.4 Errata Outline Landscape and Ecological Management Plan Appendix A – Arboricultural Impacts Plan Part 1 (Final Issue B) and Part 2 (Final Issue B)	The Applicant accepts that details for C category trees has not been collected, however confirms the baseline data collection and reporting is in line with Appendix J of **6.19 Scoping Report - including appendices B to K [APP-296]**. The Applicant maintains that the arboricultural data collection is appropriate to report on canopy cover loss and inform replacement

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
			[REP4-176] and [REP4-177], and SCC considers that this needs to be addressed.	planting where required. Following detailed design, the production of Arboricultural Method Statements and Tree Protection Plans will capture trees and hedgerows near working areas.
7.3	Landscape	Tree Protection Measures, 7.3.2	It is not sufficient to submit barrier types for approval, the locations, where the different barrier types will also need approved via a Tree Protection Plan differentiating the different types. The text needs to be amended to reflect this.	The Applicant remains committed to applying appropriate tree protection as committed to in LV05 of **7.2 Outline Code of Construction Practice [Revision H]**. 'The Main Works Contractor(s) will apply the relevant protective principles set out in BS 5837:2012: Trees in relation to design, demolition, and construction (British Standards Institution, 2012). This will be applied to trees within the Order Limits and immediate surrounds which will be preserved through the construction phase and detailed within an Arboricultural Method Statement (AMS) (including a Tree Protection Plan).'
7.4	Landscape	Table 7.1 Mitigation hierarchy for veteran trees	SCC welcomes the Applicant's commitment to a compensation ratio of 30:1 for any removal of veteran trees and maintain and monitor compensation measures for 30 years.	The Applicant welcomes the Council's support.
7.5	Landscape	Small groups and individual trees – offsite planting	It should be secured in this oLEMP that the off-site planting will be provided in accordance with the final LEMP secured under through Requirement 9 of the draft DCO. Paragraph 9.3.7 SCC considers that the Offsite Planting Delivery Scheme will need to be submitted to the relevant LPAs for their approval rather than just for information.	The Applicant refers the Council to the response to 1.2 above.
7.6	Landscape	Natural Regeneration of Woodland	Paragraph 9.3.9 It remains unclear, how it will be decided, whether supplementary planting will be deemed necessary and who will decide this. Will this be within the remit of the Ecology and Landscape Working Group? There is also a lack of commitment regarding the delivery of any such supplementary planting. SCC considers that this needs to be carried out to the same standard as reinstatement planting within the order limits and accordance with the final LEMP(s).	Supplementary planting would take place if it is required for the area to reach target condition in accordance with the requirements for no net loss to biodiversity under the BNG metric. The wording in **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** allows for the same aftercare period for supplementary planting as reinstatement planting.
7.7	Landscape	Woodland Planting Deer and Grey Squirrel Management	SCC re-iterates the urgent recommendation to provide deer and rabbit proof fencing for areas of natural regeneration.	The most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** was updated to include for the provision of deer and rabbit proof fencing for areas proposed for natural regeneration, see paragraph 9.3.11.
7.8	Landscape	Land Around Wenham Grove CSE Compound – Landscape Proposals	There has been positive engagement between the Applicant and SCC with regards to the landscape proposals. SCC would welcome, if amended proposals, as discussed, could be submitted at Deadline 7, both within the main body of the oLEMP and in Appendix D.	The Applicant welcomes the positive engagement and confirms that the following documents were updated and submitted at Deadline 7: **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** and **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [REP7-350].**
7.9	Landscape	Landscape Compensation 9.7.29	In SCC's view the offsite provision of tree replacement does not constitute landscape compensation, as it lacks strategic co-ordination, which is why SCC considers the indicative Masterplans the Applicant provided at D5 [REP5-119] are necessary. The off-site tree planting is seen as compensatory planting, i.e. replacement planting for which new locations needed to be found, because it could not be planted in the location from where it was lost. However, its value could be greatly increased, if it was implemented as part of a compensatory landscape enhancement masterplan.	The Applicant disagrees with the Council's view and considers that the 3:1 commitment in relation to individual trees and individual trees in small groups goes beyond replacement planting. The Applicant has also detailed in **8.28 Outline Offsite Planting Delivery Scheme [Revision B]** the criteria which will be taken into consideration during delivery, which demonstrate that the Applicant is going beyond simple replacement planting objectives.

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7.10	Landscape	Aftercare, General Aftercare	SCC re-iterates that for hedgerows, trees and woodland planting, five years' aftercare is insufficient, and that there need to be contingencies, which include time extensions, where plantings struggle to establish. Landowners should have a choice, after five years, whether they prefer to have the control over the land used for replacement planting handed back or whether they prefer to delay the handover until the replacement planting is sufficiently established (approximately a further five years of growth).	The Applicant considers that five-years of adaptive aftercare is sufficient because it reflects British Standards, government and industry guidance, established NSIP precedent and arboricultural research showing that successful establishment is largely determined by planting quality and early maintenance rather than prolonged aftercare. The Applicant provided justification for the five-year aftercare period for trees and hedgerows in response to ExQ1 LV 1.4 and LV 1.18 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and also orally during ISH4 and in written submissions afterwards at item numbers 5.1p and 5.1q in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. In addition, to respond to concerns raised the Applicant has previously strengthened Section 10 of **7.4 Outline Landscape and Ecological Management Plan [REP7-342]**.
7.11	Landscape	Aftercare, Woodland, Trees and Hedgerows	Watering: SCC recommends the use of soil moisture monitoring equipment, which would trigger watering, when required and independently from other aftercare measures, as these may be too infrequent to be effective, i.e. the trees may be dead by the second aftercare visit.	The Applicant wishes to reassure SCC that successful establishment of replacement planting is very much in the Applicant's interest as well as other stakeholders. Paragraph 10.2.1 of **7.4 Outline Landscape and Ecological Management Plan [REP7-342]** includes consideration of watering as follows: '*Water new plants as required to minimise failures during drought, during the five year aftercare period. All newly planted trees with a trunk diameter of 6 cm or more will be watered, if conditions require it and where practical, with monitoring of this requirement typically extending over three years. Measures could include using a buried watering tube, irrigation bag or irrigation well, where this is practical, for example in areas where there is road access for a bowser*'. The use of soil moisture monitoring equipment at selected locations along the Project could be considered, where appropriate and beneficial, to support aftercare monitoring.
7.13	Landscape	Appendix D - Outline Landscape Proposals - Tracked Changes Version, Final Issue C, July 2026 [REP6- 089]	This still only includes landscape proposals for one site rather than all sites. SCC proposes that this should be rectified, and the oLEMP main text (p.7) amended accordingly to include the right Revision reference for Appendix D.	**7.4 Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals [REP7-350]** was updated at Deadline 7 to address this.
7.14	Biodiversity	Implementation 11.2	The wording provided by SCC in regard to the formation of the Ecology and Landscape Working Group, at deadline 5 [REP5-270], provides additional detail. SCC sees no reason to deviate from this wording and therefore considers that that wording suggested in [REP5-270] should be included and secured in the oLEMP.	The Applicant refers the Council to the Applicant's response provided to 1.5 of **8.31 Response to Rule 17 Letter received 14 July 2026 [REP7-533]**.

Table B.8 8.4.14 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant comments
8.4	Archaeology	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 7: 8.2 (B) Drainage Strategy DCO [REP4-187]) While the Drainage Strategy Appendix B is not required to address archaeological impacts directly, it identified locations where drainage infrastructure, temporary and permanent construction works, and potential changes to surface-water movement may occur. These elements have the potential to affect buried archaeological remains through ground disturbance and/or changes to preservation conditions. The OAMS-OWSI should therefore take account of the drainage and construction-related works identified in this document, to ensure that all areas of ground disturbance are subject to archaeological evaluation (geophysical survey and trial trenching) and mitigation where required. "The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial trenching, as shown in the proposed trench plans provided directly to SCCAS on 3 June 2026."	SCCAS notes the Applicant's response and is currently in discussion with the Applicant regarding the Phase 2 trial-trenching plans. The plans supplied to date do not appear to target all proposed impacts for trial trenching. SCCAS will continue to engage with the Applicant to agree an appropriate scope of archaeological evaluation.	Noted. The Applicant will continue to engage with SCCAS to agree the Phase 2 trial trench evaluation. The Applicant confirms that the areas proposed for Phase 2 evaluation include all those construction works that could cause significant ground disturbance and therefore potential impact to archaeology, which includes SuDs and 3rd party (statutory undertakers) works for 132kV works. To clarify, the permanent access routes to the overhead line sections of the Project and the pulling areas for the overhead line do not require any intrusive construction works and therefore are not included in archaeological evaluation. The Applicant also provided information on this point in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**, page G31-32. The Applicant's also confirms that **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]**, paragraph 5.3.42, has been updated for Deadline 8 to include clarification that should the detailed design alter the location or nature of construction works the completed/proposed evaluation would be reviewed to determine if any new areas needed to be evaluated to determine mitigation. This is to address concerns from SCCAS regarding Figure 1 of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation**, shared after Deadline 7**.**
8.5	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.5) The Applicant acknowledges the comments regarding the use of an Historic Environment Management Plan and the approach to preservation in situ. These matters have previously been considered and addressed in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], and through the updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]]. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in those submissions.	SCCAS notes the Applicant's references to [REP5-192] and [REP5-161]. However, it remains unclear how currently unknown archaeological heritage assets which are discovered during evaluation, mitigation or construction, and subsequently determined by the applicant to be preserved in situ, would be protected from maintenance during operation or from decommissioning. The OCoCP is not an appropriate mechanism for securing this protection because it does not provide an enduring framework covering the full lifetime of the development. SCCAS therefore maintains that the Applicant should commit to preparing a Historic Environment Management Plan ("HEMP"), secured through and incorporated within the OAMS-OWSI. For example, if an Early Anglo-Saxon cemetery or Roman villa were identified and the scheme design amended to preserve it in situ, the HEMP would ensure that the Applicant retained an enduring record of its location and the extent. This would enable	The Applicant does not agree that an additional Historic Environment Management Plan (HEMP) is required to secure the long-term protection of archaeological remains preserved in situ. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]** at paragraph 5.3.2 already commits that: '*The Preservation in Situ Plan will set out protections during the pre-commencement, construction and operation (and maintenance) phases of the Project, where relevant*.' The use of the term Preservation in Situ Plan has been used to align with the Requirement 5 wording of **3.1 Draft DCO [Revision H]**, which provides an enduring mechanism for identifying, recording and protecting archaeological remains preserved in situ for the lifetime of the Project. The Applicant therefore considers that the functionality sought by SCCAS is already secured through the Preservation in Situ Plan and that a separate HEMP would duplicate provisions already contained within the approved archaeological mitigation framework.

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			future maintenance works to avoid inadvertent impacts or, where avoidance is not possible, trigger appropriate consultation with the relevant Local Planning Authority Archaeological Advisor and archaeological mitigation. NB. SCCAS are not expecting National Grid to maintain heritage assets on land outside of their ownership and control. The purpose of the HEMP is to ensure that future maintenance and works do not impact these heritage assets.	
8.9	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] ExQ) The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5 192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5161] includes provision for further geoarchaeological/palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete.	SCCAS notes the Applicant's response. However, SCCAS's concerns regarding the provisions within the OAMS-OWSI have not been fully resolved. Further comments are set out in SCC Comments on Submissions Received at Deadline 5 [REP6-167].	The Applicant responded to the comments provided by SCCAS in REP6-167 at Deadline 7 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and provided an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-352]**. SCCAS provided comments on **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-352]** directly to the Applicant after Deadline 7. A further update has been made to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]**, submitted at Deadline 8, in response to this. In addition, in response to SCCAS comment on paragraph 5.3.44 the Applicant does not propose to make a further update to this paragraph as there is already provision for all mitigation areas to be agreed with the LPA archaeological advisor on a site-by-site basis and therefore any site-specific considerations will be accounted for through this process. Regarding the comments from SCCAS on the mitigation areas shown on Figure 2 the Applicant is pleased to see these are largely agreed with the exception of three specific areas. For these areas the extensions requested by SCCAS have not been accepted as they are comparatively minor and include areas where there is a likelihood there are no significant archaeological remains. The Applicant notes that they have made the majority of the updates requested by SCCAS to the mitigation areas and the wording of the OAMS-OWSI. This includes provision for the extension of mitigation areas should significant archaeology be found to extend beyond defined mitigation areas during excavation, which would cover the most recent specific requests from SCCAS if significant archaeology should prove to extend further than currently expected.
8.10	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.12) The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial tenching, as	SCCAS notes the Applicant's response and acknowledges that the remaining priority evaluation reports have now been provided directly to SCCAS. SCCAS also acknowledges that a meeting was held with the Applicant on 11th June 2026 to discuss the priority mitigation areas. Where SCCAS	The Applicant responded to the comments provided by SCCAS in REP6-167 at Deadline 7 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and provided updated versions of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-352]** and Detailed WSIs for priority area mitigation in documents **8.18-8.24**

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		shown in the proposed trench plans provided directly to SCCAS on 3 June 2026. An updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5161] was submitted at Deadline 5 in response to comments provided by SCCAS, Historic England and other LPA archaeological advisors. There were four priority evaluation sites in Suffolk and two of the assessment reports for these were submitted in January. The other two have subsequently been shared with SCCAS directly in June 2026. SCCAS and the Applicant met to discuss the priority mitigation areas on 11 June 2026.	have asked for amendments to the applicants proposed priority mitigation areas and additional mitigation areas. SCCAS is also currently in discussion with the Applicant regarding the proposed Phase 2 trial trenching. SCCAS has provided separate comments on the updated Document 7.5, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], in SCC Comments on Submissions Received at Deadline 5 [REP6-167].	**[REP7-500 – REP7-513].** The Applicant will continue to engage with SCCAS to agree the Phase 2 trial trench evaluation.
8.11	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.3) In order to be registered on Natural England's off-site Biodiversity Net Gain (BNG) register, a series of steps are undertaken which includes consideration of other environmental constraints such as archaeology. No specific commitments regarding off-site BNG locations and archaeology as part of this Development Consent Order are therefore necessary or possible. Works within the Order Limits would be subject to the programme of archaeological works secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], which already includes provision for environmental mitigation. The details of this would be set out in subsequent DWSIs.	SCCAS notes the Applicant's clarification regarding the process for registering off-site biodiversity gain sites with Natural England and its confirmation that no specific off- site habitat creation, enhancement or management works are proposed or secured as part of this Development Consent Order. However, should any specific off-site habitat works subsequently be relied upon as project mitigation and secured through the DCO or an associated legal obligation, their archaeological implications should be appropriately assessed and addressed through the relevant consenting or delivery mechanism. SCCAS notes that document 8.28 Outline Offsite Planting Delivery Scheme [REP6-128] records the potential for offsite tree planting as mitigation. Any areas which will be subject to offsite tree planting should be archaeologically assessed through trial trenching where appropriate. The relevant local planning authority archaeological adviser should be consulted at an early stage to agree the scope of any assessment, evaluation and mitigation for any areas of land brought forward for this purpose. This should be reflected in the OAMS- OWSI. SCCAS also notes the Applicant's confirmation that habitat creation and other environmental mitigation works within the Order Limits will be subject to the programme of archaeological works secured through Document 7.5 Outline Archaeological	The Applicant has provided a response to the point raised regarding the delivery of offsite BNG in ID 3.6.16 of **5.9.2 Signed Statement of Common Ground - Suffolk County Council [REP7-097]** which has been agreed. The Applicant notes SCCAS's comments regarding off-site tree planting. As no specific off-site planting works are secured through the Order, it would not be appropriate for the DCO to impose detailed archaeological requirements in respect of works that are currently undefined and fall outside the scope of the authorised development. The Applicant does not consider it necessary or proportionate to require archaeological trial trenching for all areas that may be brought forward for off-site tree planting. **8.28 Outline Offsite Planting Delivery Scheme [Revision B]** already includes site selection criteria requiring consideration of known archaeology and heritage assets, including a commitment to seek to avoid conflict with, or potential damage to, known archaeology or the setting of heritage assets. Furthermore, with the exception of one identified location, no specific off-site planting sites have yet been identified, and it is therefore not currently possible to assess the archaeological sensitivity of any future planting area. In addition, **8.28 Outline Offsite Planting Delivery Scheme [Revision B]** commits to the use of relatively small planting stock (1.5m feathered trees and 60cm transplants), which would result in limited and localised ground disturbance. In these circumstances, the Applicant does not consider there to be sufficient justification for a blanket requirement for archaeological trial trenching.

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			Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], with detailed measures to be set out in the relevant DWSIs. SCCAS considers that on-site habitat creation and environmental mitigation areas involving ground disturbance or otherwise having the potential to affect archaeological remains, should be clearly identified and addressed in the relevant DWSIs. Subject to these matters being appropriately addressed, SCCAS has no further comment at this stage.	
8.12	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.8) 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] already includes for trenchless crossings, at paragraph 4.6.13: "Where it is determined that preservation in situ is achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting, emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance." As this is already committed to, and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] is secured through Requirement 5 of 3.1 Draft DCO [REP5-060], the Applicant does not consider it is necessary to also update GH12.	SCCAS notes the applicant's comments and would like to assure the applicant that we are not seeking to establish a methodology within the OCoCP. SCCAS has therefore amended its request for an additional bullet point, which should serve as a signpost within commitment GH12 to the relevant methodological documents. SCCAS considers that Commitment GH12 should include, as a minimum, the following additional bullet point: "Drilling clay breakout in areas where archaeological remains are to be preserved in situ will be managed in accordance with a methodology defined in the OAMS- OWSI and relevant DWSI." This addition is requested to provide clarity for on-site engineers regarding the methodology to be followed when undertaking drilling clay breakout mitigation in archaeologically sensitive areas. It would also direct them to the documents setting out the appropriate methodology and any necessary remediation measures. SCCAS therefore maintains that this limited amendment would improve the clarity and usability of the commitment GH12 without creating any new or additional obligation for the Applicant.	The suggested bullet point has been added to the latest iteration of **7.2 Outline Code of Construction Practice [Revision H]**.
8.15	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.13) As discussed in paragraph 4.8.72 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] there are multiple methods of trenchless installation that could be	SCCAS notes that Appendix C of the Hydrogeological Risk Assessment [APP-185] describes the possible trenchless methodologies.	A geotechnical desk top study has been undertaken along with the hydrogeological risk assessment to inform a de risking ground investigation. The ground investigation and subsequent interpretive report has informed the decision to undertake a trenchless crossing method to pass under the River Stour. As highlighted further survey

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		used. The location and methodology for the trenchless crossing of the River Stour will be determined at detailed design following further investigation and detailed design; however, all potential options have been allowed for within the assessment. Refer to Appendix C of 6.9.A4 Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP-185] for details on possible trenchless methodologies.	Different trenchless crossing methodologies require very different archaeological mitigation strategies. Since the precise engineering methodologies have not been formalised the OAMS-OWSI should reflect that a range of archaeological mitigation may need to be applied. The Applicant's response does not define what, if any, additional studies have been undertaken to establish the feasibility of trenchless crossing.	works and detailed design will inform the method of trenchless construction to be utilised at thew crossing. The OAMS-OWSI includes provision for a suitable range of archaeological mitigation for trenchless crossings (**7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]**).
8.16	Archaeology	[Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.15) The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] include provision for further geoarchaeological/palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete. Regarding the Hydrogeological Risk Assessment commitment GH11 in 7.2 Outline Code of Construction Practice [REP5-139] includes assessment for archaeological deposits. It is the Applicant's view that 7.2 Outline Code of Construction Practice [REP5-139], 7.4 Outline Landscape and Ecological Management Plan [REP5-157] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] complement each other and do not contain contradictions.	SCCAS notes the Applicant's confirmation that the OAMS-OWSI [REP5-161] provides for further geoarchaeological and palaeoenvironmental investigation and mitigation once the detailed crossing design and methodology are known. The OAMS-OWSI is still not approved and SCCAS have provided further comments on the OAMS-OWSI in SCC Comments on Submissions Received at Deadline 5 [REP6-167]. SCCAS also welcomes the confirmation that the Hydrogeological Risk Assessment secured by commitment GH11 will include archaeological deposits.	The Applicant responded to the comments provided by SCCAS in REP6-167 at Deadline 7 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and provided an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-352].**
8.17	Skills, Education and Employment	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 12: 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.1 Health and Wellbeing) "The scope of the Technical Note was not intended to address cumulative or overlapping pressures, but simply to present findings from a comparative assessment of 2019 and 2025 Index of Multiple Deprivation (IMD) data, including a focus on localised deprivation as set out in the ExA's Rule 17 Letter [PD-019]. The Applicant considers the Technical Note fulfils this scope.	SCC notes the Applicant's conclusion that the 2025 Index of Multiple Deprivation ("IMD") data does not materially alter the findings of the socio-economic assessment. SCC does not dispute that overall deprivation patterns across the study area remain broadly consistent. However, SCC notes that the updated data identifies changes in relative deprivation within a number of authorities and across specific domains, including employment and education, skills and training.	Table 2.3 in **8.16 Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317]** highlights change in deprivation ranking by individual domain for Local Planning Authorities between 2019 and 2025; the table shows that, for Suffolk, deprivation relating to the income, employment and education, skills and training domains has remained broadly the same over time. The Technical Note concludes that changes between 2019 and 2025 do not materially alter the overall deprivation profile of local authorities along the Project route and as such are not considered to have implications for matters assessed within **6.15 Environmental Statement Chapter 15 - Socio-Economics, Recreation and Tourism [REP7-296]**. In relation to workforce demand, skills requirements and cumulative labour market pressures, approximately 10% of the construction

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant comments
		An assessment of cumulative effects, which include cumulative effects on health and wellbeing, has been completed for the Project and covers how combined pressures may interact. The findings from this assessment are presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. 8.16 Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] concludes that the overall pattern of deprivation along the Project has remained broadly consistent between 2019 and 2025. Although there may be relative increases in deprivation in parts of Braintree and Mid Suffolk, which may highlight greater vulnerability among local populations, the Technical Note also notes that changes in IMD rankings are largely a function of methodological adjustments and boundary revisions rather than dramatic shifts in underlying living conditions. The revised data does not materially alter the sensitivity or assessment outcomes presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B]. Good practice measures already identified in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B] and associated documents such as 7.2 Outline Code of Construction Practice [Revision F] are considered sufficient to address potential impacts identified, which are not significant (for example include preparation of a detailed communication strategy to inform communities of construction activities and the preparation of a detailed complaints procedure)."	SCC's concern is not limited to whether overall deprivation rankings have changed, but whether changes within those domains have implications for labour market capacity, workforce availability and the ability of local communities to access Project-related employment and skills opportunities, particularly when considered alongside the cumulative demands arising from other NSIPs in the region. Whilst the Technical Note concludes that the updated IMD data does not materially alter the assessment findings, it does not provide any further analysis of these potential labour market implications. SCC therefore maintains its previously stated position that a more robust understanding of workforce demand, skills requirements and cumulative labour market pressures is required through the Employment and Skills Plan process, supported by detailed workforce evidence and coordination through the Regional Skills Coordination Function. This matter is not resolved by the IMD analysis presented within the Technical Note.	workforce is expected to be sourced locally, reflecting the specialist nature of much of the construction activity and reducing the potential for significant competition within local labour markets. In **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**), the Applicant has comprehensively described the role of the Great Grid Partnership (GGP) in terms of enabling early contractor appointment, workforce planning and resource management across the wider Accelerated Strategic Transmission Investment (ASTI) programme. The Applicant has previously noted that the predominant overlap of skilled resources with other major infrastructure projects is expected to be in relation to civils construction activities, where there is no identified shortage within the energy infrastructure sector. **8.13 Outline Employment and Skills Plan [REP7-489]** has been prepared as an outline document which is proportionate to the current stage of the Project and recognising that detailed workforce requirements, procurement packages and contractor arrangements will continue to evolve prior to construction. The Final OESP is the appropriate mechanism through which detailed information relating to workforce demand and skills requirements would be provided and would include collaboration with the Regional Skills Coordination Function.
8.18	Skills, Education and Employment	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 12: 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.2 Skills) "The scope of the Technical Note is limited to the scope set out in the ExA's Rule 17 Letter [PD-019] (i.e. comparison of 2019 and 2025 IMD data and changes in localised deprivation over time) and therefore does not address issues relating to labour market capacity, skills availability, or cumulative workforce pressures arising from the Project. The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak on-site construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year	SCC acknowledges the Applicant's clarification that the purpose of the Technical Note was to respond to the Examining Authority's request regarding changes in Index of Multiple Deprivation data and localised deprivation. SCC agrees that the Technical Note was not intended to provide a detailed assessment of labour market capacity, skills availability or cumulative workforce demand. However, SCC notes that the Applicant has relied on the response to conclude that workforce demand associated with the Project is modest in scale and not significant and references the Outline Employment and Skills Plan ("OESP") as the mechanism through which workforce, skills and supply chain matters will be addressed. SCC's concern is	The conclusion that workforce demand is modest in scale and not significant is informed by the Applicant's knowledge of current and previous National Grid schemes, noting that the majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines and who are typically sourced from National Grid's existing pool of approved contractors. In relation to whether sufficient evidence has been provided to understand how workforce demand, skills requirements and supply chain needs will interact with local labour market conditions and cumulative demand arising from other major infrastructure projects across the region, the Applicant maintains its position as set out in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and in the above response.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant comments
		construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. The Applicant submitted 8.13 Outline Employment and Skills Plan [REP5 215] (OESP) at Deadline 5. This provides a clear and structured framework to support local workforce development, skills enhancement and engagement with local businesses, and will be refined as part of the Project's delivery. The OESP includes an overview of employment and skills profile data for the local population and 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 OESP was developed in collaboration with host authorities including Suffolk County Council; the Applicant is committed to ongoing engagement with stakeholders during the preparation and delivery of the Final Employment and Skills Plan."	not solely the scale of workforce demand in isolation, but whether sufficient evidence has been provided to understand how workforce demand, skills requirements and supply chain needs will interact with local labour market conditions and cumulative demand arising from other major infrastructure projects across the region. As set out in SCC's previous submissions, the OESP does not currently provide a sufficiently detailed evidence base regarding workforce demand, skills requirements, supply chain implications, monitoring arrangements or cumulative impacts. SCC therefore maintains its position that further evidence and coordination, including through the Regional Skills Coordination Function ("RSCF"), are required to provide confidence that workforce and skills impacts have been fully understood and can be effectively managed through the Final Employment and Skills Plan.	
8.19	Skills, Education and Employment	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270], 5.1, 3.16.8) "The Applicant acknowledges Suffolk County Council's comments. 8.13 Outline Employment and Skills Plan [REP5-215] (OESP) is an outline, non-statutory document which establishes a framework for the delivery of employment, skills and supply chain outcomes. The assessment of workforce demand and associated impacts has been undertaken for the Project and is reported within 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision B], including consideration of construction employment, labour market effects and associated socio-economic impacts. This includes an assessment of likely workforce requirements and their interaction with local labour markets at a proportionate level for the application stage. Further detail on workforce profiling, including phase-specific labour demand, skills requirements and delivery arrangements, will be developed through the Final ESP, informed by detailed design, construction programming and contractor input. The OESP recognises the importance of regional coordination mechanisms, including the Regional Skills Coordination Function (RSCF), in supporting alignment of skills provision and workforce development across the Eastern region. The OESP establishes a framework for engagement with relevant stakeholders and does not seek to duplicate or replicate existing regional coordination	SCC acknowledges the Applicant's response but does not consider that it addresses the substantive concerns previously raised. While SCC recognises that the OESP is an outline document, the Applicant's response continues to rely on the future development of key elements of workforce planning, skills delivery, supply chain engagement, governance arrangements, targets and monitoring frameworks through the Final ESP. SCC's concern is not that the OESP is an outline document in principle, but that the current level of detail and evidence does not provide sufficient confidence that workforce demand, skills requirements and cumulative labour market impacts have been properly understood and can be effectively managed. SCC notes the Applicant's position that workforce impacts have been assessed at a proportionate level within the Environmental Statement. However, SCC maintains that the absence of detailed workforce profiling, phase-specific labour demand assumptions and supply chain workforce requirements limits the ability to understand how demand will arise over time and interact with existing labour market constraints and other major	The Applicant maintains its position as set out in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]** that **8.13 Outline Employment and Skills Strategy [REP7-489]** (the Outline ESP) is appropriate in scope and level of detail given that its role is to maximise beneficial economic outcomes rather than one of mitigation. **8.13 Outline Employment and Skills Strategy [REP7-489]** was updated at Deadline 7. Paragraph 6.4.2 describes how the Applicant will 'work with' the RCSF to co-ordinate and align training and procurement. The Applicant is of the opinion that the Outline ESP is sufficiently comprehensive and appropriate given its intended objective and status as an outline document. Furthermore, **3.1 Draft DCO [Revision H]** requires the Final ESP to be submitted to the relevant county planning authority (and Thurrock Council) for its approval prior to the commencement of the authorised development.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant comments
		structures. The Applicant will engage with appropriate regional and local mechanisms, including the RSCF where relevant, to support coordination of employment and skills activity. Further detail on how this engagement will be taken forward in practice, including the role of relevant stakeholders and coordination arrangements, will be developed through the Final ESP, in collaboration with partners and informed by the construction programme and contractor input. The OESP sets out measures to maximise beneficial outcomes and support skills development. The approach set out within the OESP will be developed further through the Final ESP, which will include proportionate detail on delivery arrangements, including the identification of appropriate targets, responsibilities and monitoring frameworks, informed by detailed design, the construction programme and contractor input."	infrastructure projects across the region. These matters are particularly important given the concentration of NSIPs within Suffolk and the wider Eastern region. SCC also notes the Applicant's commitment to engage with appropriate regional and local mechanisms, including the Regional Skills Coordination Function (RSCF) "where relevant". However, SCC's concern remains that the Applicant has not committed clearly to working through the RSCF as the established mechanism for coordinating labour demand, aligning skills provision and managing cumulative workforc pressures. The proposed approach remains focused on future engagement arrangements to be determined post-consent, rather than establishing a clear framework for coordination at this stage. Similarly, while SCC welcomes the Applicant's intention for the Final ESP to include targets, responsibilities and monitoring frameworks, these matters continue to be deferred to the post-consent stage. Until such measures are defined, SCC remains concerned that it is not possible to determine whether the proposed approach will be proportionate, deliverable or sufficient to address workforce, skills and supply chain needs, or whether meaningful outcomes can be secured through the DCO. SCC maintains its position that the OESP should provide a stronger evidence base in relation to workforce demand, skills requirements, supply chain implications, governance and cumulative impacts, together with clearer commitments regarding engagement through the RSCF, monitoring arrangements and delivery outcomes, to ensure that the Final ESP can function as an effective mechanism for managing socio-economic impacts and maximising local employment and skills benefits.	

Table B.9 8.4.15 (A) Applicant's Comments on Responses to ExQ2 [REP6-115]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
9.1	Archaeology	HE 2.13 "The Applicant acknowledges the comments regarding the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation. Comments from SCC were received in advance of Deadline 5 and were addressed in the updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] submitted at Deadline 5."	SCC Archaeological Service welcomes the amendments made to the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. However, a number of matters remain unresolved, and SCC Archaeological Service does not agree with all aspects of the revised document. Further comments identifying the outstanding matters have therefore been provided to the Applicant and submitted to the Examination at Deadline 6 in SCC comments on submissions received at Deadline 5 [REP6-167].	The Applicant responded to the comments provided by SCCAS in REP6-167 at Deadline 7 in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and provided an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-352].**
9.2	Health and Wellbeing	HW 2.1, Communication Strategy	Public Health welcomes the additional commitments now included within Appendix E of the Outline Code of Construction Practice [REP6-079] regarding complaint logging, investigation, escalation routes, response times and the regular review of complaints data to identify recurring issues by location or topic. It is suggested that the frequency of complaints reviews (referred to in paragraph 2.1.2, bullet point 6) should be specified, for example through a commitment to undertake reviews on a monthly basis. Whilst Public Health welcomes the additional complaints management arrangements, we continue to consider that a broader health and wellbeing monitoring process is required, consistent with our previous submissions including [RR-3520] and in response to Examining Authority question HW 2.1 of [REP5-271].	The Applicant notes that SCC welcomes the additional commitments relating to complaints management arrangements now included in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]**. The Outline Code of Construction Practice provides the overarching framework for community engagement, public information and the management of enquiries and complaints during construction. This framework is supported by the wider suite of management plans, monitoring and reporting mechanisms secured through the DCO Requirements and other commitments within the application documents. The Applicant considers that the current framework provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, including local authorities, where appropriate. The Applicant therefore considers that Appendix E provides an appropriate and proportionate framework for managing complaints and community relations during construction and that no further amendment is required in response to this representation. The Applicant maintains its position in relation to health and wellbeing monitoring as set out in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**; no significant health and wellbeing impacts have been identified through the EIA process and, with a combination of appropriate proactive and reactive engagement activities (i.e. communication of construction activities to affected communities in a timely manner, accompanied by a robust complaints procedure), impacts on community health and wellbeing can be effectively managed.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
9.3	Health and Wellbeing	DCO 2.S10, Schedules 3, Requirement 7 (Construction Hours)	Public Health maintain our position as set out [REP5-270].	The Applicant responded to the comments provided by SCC in REP6-115 at Deadline 6 in **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115].**

Table B.10 8.5.11 (A) Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
10.1	Archaeology	Requirement 5 (Archaeology) Oral Summary of the Applicant's Case The Applicant did not speak first and only responded to matters raised by IPs (see below). Applicant's Comments on Matters Raised by IPs In response to SCC, who have requested that pre-commencement works are the subject of prior evaluation or investigation through a requirement, as proposed in the Sea Link DCO, the Applicant maintains that a blanket requirement, where risk to archaeology is not consistent across the board, is neither reasonable nor proportionate. As presently drafted, any breaking of ground, however minor, which would including putting a single fence post in for preliminary enclosure work, would be caught by this requirement. The Applicant notes that Historic England has confirmed it is satisfied with both the revised Requirement 5 drafting and the revised 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. A blanket prohibition must only be included if it can be justified on the facts. The Applicant's position is that Sea Link is different, it is geographically separate from Norwich to Tilbury and has specifically different archaeological potential to Norwich to Tilbury, including the shoreline which was referred to in that project's hearings. Norwich to Tilbury has a very different profile in respect of the scale and the delivery programme. The position faced by the Sea Link project in respect of archaeology is very different to the position faced by the Norwich to Tilbury Project and, therefore, it is neither appropriate nor proportionate in this case to apply a blanket restriction on pre-commencement works that involve breaking ground. Post Hearing Update A blanket prohibition must only be included if it can be justified on the facts. As noted above, the Applicant's position is that Sea Link is different, it is geographically separate from Norwich to Tilbury and has specifically different archaeological potential, including the shoreline	SCCAS disagrees with the Applicant's comments that this project can be distinguished from the Sea Link project as regards the need to safeguard archaeology. The archaeological process is the same for both projects: evaluation establishes the archaeological potential and significance of the affected area and informs mitigation proportionate to the development impacts. Project-specific differences may affect the extent and form of evaluation and mitigation required, but they do not alter this fundamental process. The purpose is not to impose a blanket restriction on the development, but to ensure that intrusive pre-commencement works are informed by the results of appropriate archaeological evaluation, including trial trenching, and that proportionate mitigation is developed and implemented in response to the identified archaeological significance and development impacts. The breadth of pre-commencement operations as defined by Article 2(1) includes several which may involve intrusive works below current ground level and the interaction of the definition of 'commence' and Requirement 5 means that all of these operations are excluded from the need for prior archaeological evaluation. The Applicant's response does not address the breadth of this exclusion but rather focuses on the example of 'a single fence post'. However, even such a fence post (albeit in reality it is artificial to contemplate a 'single' fence post in isolation from other posts) could have damaging effects on near-surface archaeology. The Outline Archaeological Mitigation Strategy and OWSI [REP5-161] recognises (at para 4.1.2) that the pre- commencement operations at all temporary construction sites could include fencing and gated entrances which are adequate to secure the site. Site clearance is also a pre-commencement operation, and [REP5-161] indicates that this will include soil stripping within construction sites. The OAMS-OWSI establishes the overarching methodology and process for archaeological work following consent, while a DWSI would define the scope and detailed methodology for the relevant archaeological works. However, because of the 'carve out' for all pre-commencement operations, the current wording of Requirement 5 does not prevent intrusive pre-commencement works from commencing before the archaeological trial trenching and/or any necessary mitigation specified in the relevant DWSI have been completed. Intrusive pre-commencement works have the potential to	The Applicant provided further responses regarding Requirement 5 in 8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP7-482], page 55, and maintains its position as stated in that document. Requirement 5(7) secures that all pre-commencement works must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D] already includes provision for evaluation, if not already undertaken, of the types of pre-commencement works that would require significant ground disturbance that could impact archaeology, such as diversion and laying of services. Therefore, any blanket prohibition on pre-commencement works is not necessary.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		which was referred to in that project's hearings, its scale and the delivery programme. The current system set out in the revised 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] submitted at Deadline 5 means that: Pre-commencement activities with potential to result in impacts to archaeology are already included in the scope of archaeological evaluation, which has either been completed or is planned, with mitigation determined where relevant following evaluation. Requirement 5 therefore ensures that appropriate archaeological protections are in place for pre-commencement works that may be reasonably expected to impact archaeology and no further amendment to the wording is necessary. In addition, certain pre- commencement works (those with a small, defined construction impact where potential for archaeological remains is low) could be mitigated through archaeological monitoring and recording, which would ensure the works would be undertaken under the supervision of an archaeologist who has the right and the ability to stop the works if archaeology is found during any intrusive activities (see paragraphs 5.3.152 to 5.3.149 of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]).Written schemes of investigation would be agreed for these activities as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. The Applicant's position remains that, given its extensive trial trenching and the protections set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and Requirement 5, insufficient justification has been provided to warrant a blanket restriction on pre-commencement operations that involve breaking ground.	damage or destroy currently unknown archaeological heritage assets that would otherwise be identified through evaluation. Archaeological monitoring and recording is appropriate only for small-scale construction impacts where other forms of archaeological mitigation cannot practicably be undertaken. Low archaeological potential does not, in itself, provide sufficient justification for adopting this methodology. Furthermore, although the Applicant states that written schemes of investigation would be agreed for these activities, the current wording of Requirement 5 does not secure the preparation, approval and implementation of a DWSI for archaeological works associated with intrusive pre-commencement works. Consequently, even if monitoring and recording were accepted as appropriate mitigation for a particular element of intrusive pre-commencement work, the Requirement would not ensure that the relevant DWSI had been approved and the archaeological measures implemented before that pre-commencement work commenced. SCCAS therefore maintains that Requirement 5 should be amended to include intrusive pre-commencement works and to ensure that such works do not commence until the relevant DWSI has been approved and the archaeological evaluation and any necessary mitigation required by that DWSI have been undertaken at the appropriate stage.	
10.2	Health and Wellbeing	Requirement 7 (Construction hours)	SCC (Public Health) acknowledges the additional information provided by the Applicant regarding programme delivery. However, the Applicant has not explained the apparent criticality of the extended hours sought to the delivery of a programme for the project, in the context that the Applicant has acknowledged (in its response to ExQ2 DCO2.S10 in [REP5-211]) that "At the pre-consent stage, the final construction working hours to be approved through the DCO are not fixed. As a result, it is not appropriate to embed extended hours or weekend working assumptions into the programme The programme is therefore developed by working back from the required delivery date, taking into account typical levels of construction	The Applicant has set out its final position on construction working hours in **8.34 Applicants Closing Statement with a Summary of Areas of Disagreement** which addresses concerns regarding community respite and weekend working.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			productivity rather than assuming that all available hours are fully productive… Taking account of the above for the purposes of modelling, contractor programmes are typically structured around standard calendar assumptions (five-day working week, 09:00-17:00), with detailed crew shift patterns not explicitly modelled." Notwithstanding that the Applicant has recently sought to 'walk away' from that very clear explanation (which it now claims at para 1.4.1 of [REP6-117] "may have unintentionally created a misleading impression"), the Applicant has not presented evidence to demonstrate by reference to any modelled work programme that it needs the extended construction hours in order to achieve any specific programme delivery date. It remains the case, on the evidence, that the only justification provided for the extended construction hours is (a) to allow for some (not all) specialist activities which are delivered on a 12 day shift pattern, and (b) to allow flexibility to make up time for unforeseen delays or other contingencies. Even these justifications have not been demonstrated by reference to any actual programme. Whilst the Applicant now identifies the potential for a delay in Paragraph 1.5.3 of [REP6- 117] of approximately 6 to 12 months should Sunday working be restricted, this estimate is presented as a broad range and is acknowledged to depend upon a range of assumptions relating to workforce availability, contractor mobilisation, seasonal conditions, productivity, outage requirements and third-party access windows. The evidence therefore demonstrates at best no more than the possibility of delay rather than providing certainty regarding either the scale or inevitability of delay. The Applicant's case appears to place significant weight on maintaining maximum programme flexibility, but comparatively less weight on the potential benefits to communities arising from greater certainty of respite during the construction period. Public Health does not agree that the absence of significant adverse effects, as indicated in Paragraph 1.3.2, demonstrates that additional controls on construction hours would provide no benefit. The issue is not simply whether the proposed hours would result in unacceptable effects, but whether a reasonable and proportionate requirement could further reduce opportunities for disturbance and enhance community wellbeing. Restricting construction activity during Sundays and other sensitive periods would be expected to reduce the likelihood of disturbance at times when residents would reasonably expect greater opportunity for rest, recovery, family life and recreational activity. SCC has acknowledged that the restrictions it seeks could be subject to permitted departures if a justified case was made (e.g. to make up time lost due to adverse weather or unexpected events) and with effective project management and forward planning there is no reason why such a process need add delay to the programme. Disruption to sleep is a key example through which health may be impacted. Irregular or prolonged noise exposure, especially during early mornings or evenings, can reduce both sleep duration and	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			qualityi. This may lead not only to physical fatigue, but also to impaired cognitive function, reduced concentration, and decreased productivity. In addition, ongoing disturbance with limited opportunity for respite can result in chronic stressii, particularly where residents perceive a lack of control or predictability within their environment. Whilst the magnitude of these effects will vary between individuals, it is reasonable to conclude that reducing the periods during which construction activity may occur is likely to reduce the frequency and likelihood of disturbance being experienced. Public Health also notes the Applicant's position that restricting Sunday working may prolong the overall construction programme and therefore extend the period during which communities experience a construction presence. However, duration and intensity of exposure are distinct considerations. A longer programme does not necessarily result in a greater health burden if affected communities benefit from regular and predictable respite from construction activity. The provision of routine periods free from construction disturbance can represent a meaningful mitigation measure in its own right and may help reduce cumulative stress and perceptions of prolonged disruption, particularly across a project of this scale and duration. Public Health notes the Applicant's references to the Yorkshire GREEN examination and the conclusions reached by the Examining Authority in that case regarding construction working hours. Whilst useful as a comparator, Public Health considers that limited weight should be attached to direct comparisons between the two projects without consideration of local context. In particular, the Applicant's submission does not adequately account for the exceptional concentration of NSIPs that are consented, under construction, or currently progressing through the DCO process across Suffolk and the wider East Anglia region. In this context, the value of predictable periods of respite may be greater than in areas where communities are exposed to fewer concurrent or sequential infrastructure projects. Whilst Public Health recognises that certain specialist activities may legitimately require extended or continuous working arrangements for technical, safety or operational reasons, this does not however justify unrestricted project wide flexibility as the default position. The Applicant's submission identifies a number of specialist activities including foundation construction, tower assembly and erection, conductor installation (stringing), horizontal directional drilling, cable installation and cable jointing which may require continuity of operations or extended working periods in specific circumstances. Public Health accepts that there may be circumstances where such activities cannot reasonably be constrained to standard working patterns without creating engineering, safety or programme risks. However, these examples do not necessarily demonstrate that unrestricted Sunday and Bank Holiday working is required across the project as a whole, nor that all construction activities will require the same degree of flexibility. Rather, they demonstrate the need for a mechanism to consider exceptions where there is a clear and evidenced justification. In Public Health's view, a more proportionate	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			approach would be to seek LPA approval for working outside the standard construction hours where specific activities, programme constraints, engineering requirements or safety considerations can be demonstrated. Such an approach would not prevent the delivery of activities that genuinely require extended or continuous working arrangements, but would ensure that departures from standard hours are justified on a case-by- case basis and subject to appropriate consideration of local circumstances and potential impacts on nearby communities. Public Health therefore continues to support the approach detailed by Essex County Council as set out in [REP5-271] in ExQ2 DCO 2.S10.	

Table B.11 8.5.12 (A) Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
11.1	Planning	Table 2.1 Item 5 (Landscape and Visual Effects) 5.1a (Compensation and the mitigation hierarchy) Oral Summary of the Applicant's Case The Applicant retains its position that there is no requirement in law or policy for landscape harm necessarily to be offset or compensated. It has considered the extent of the mitigation which it has provided which includes the use of the Holford and Horlock rules, embedded mitigation where necessary and the potential for screening or softening. It has offsetting is not justified, necessary or proportionate. […] considered whether compensation or offsetting landscape harm is a necessary policy requirement or could legitimately reduce the residual visual impact of the proposal. It has concluded that there is no necessary policy requirement and that offsite	SCC disagrees with the Applicant's assessment that landscape compensation and offsetting measures are not necessary. SCC responded to the point concerning necessity of landscape compensation and offsetting under 5.1.a of SCC's Post-Hearing Submission for ISH3/4 [REP6-166]. The Council does not consider that the Applicant has adequately engaged with those representations.	The Applicant understands that this is not a matter upon which the Applicant and the Council will be agreed. The Applicant maintains the position it most recently set out in During ISH4 detailed in 5.1a-f of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** and **8.34 Applicant's Closing Statement and Summary Areas of Disagreement.**
11.2	Planning	Annex A (Schedule 20 Landscape Compensation Offsetting and Enhancement in relation to Specific Locations)	SCC has had discussions with the Applicant since Deadline 6. Further comments on proposed Schedule 20 are included in SCC's response to Question 6.2 of the ExA's Rule 17 Letter (dated 14 July 2026) submitted at this deadline.	The Applicant had included Schedule 20 in **3.1 Draft DCO [Revision H]** at Deadline 7, the drafting was revised from that submitted in Annex A in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** at Deadline 6 following comments received from the LPAs.

Table B.12 8.30 (A) Response to Rule 17 Letter received 30 June 2026 [REP6-132]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
12.1	Skills, Education and Employment	Employment and Skills Plan 2b	SCC notes the Applicant's position that the Employment and Skills Plan ("ESP") is a benefit-led document rather than a mitigation measure and therefore does not require approval through Requirement 15. However, SCC does not agree that this distinction removes the need for an approval mechanism. Whilst the Outline Employment and Skills Plan ("OESP") seeks to maximise employment, skills and supply chain opportunities, SCC's position throughout the Examination has been that workforce demand associated with major infrastructure projects can also give rise to adverse socio-economic effects, particularly in the context of existing skills shortages, labour market constraints and the concentration of NSIPs across Suffolk and the wider region. These include risks associated with labour displacement, competition for skills and supply chain capacity, wage inflation and cumulative labour market pressures. As such, the ESP is relevant not only to the delivery of benefits but also to the understanding and management of workforce and supply chain effects arising from the Project. SCC does not dispute that NPS EN-1 provides flexibility regarding the manner in which employment and skills measures may be secured. However, the proposed Requirement does not provide sufficient certainty and accountability given the Applicant's reliance on the Final ESP to define key workforce, skills, supply chain, governance and monitoring arrangements that are not currently established within the OESP. In SCC's view, where significant elements of the delivery framework are deferred to a post-consent stage, approval of the Final ESP by the relevant local authorities is necessary to ensure that the commitments secured through Requirement 15 are translated into a proportionate, evidence-led and deliverable programme. SCC also does not agree that requiring approval would improperly treat the ESP as a mitigation document. Rather, approval would provide an appropriate mechanism to ensure that the Final ESP is consistent with the OESP, supported by an adequate evidence base, aligned with the Regional Skills Coordination Function ("RSCF") and other relevant governance arrangements, and contains clear targets, monitoring and reporting mechanisms. This is particularly important given SCC's continuing concerns regarding the absence of detailed workforce profiling, defined interventions and measurable outcomes within the current OESP. SCC maintains its position that Requirement 15 should require approval of the Final ESP by the relevant local authorities prior to commencement. This would not be disproportionate, nor would it conflate benefits with mitigation. Instead, it would provide the necessary confidence that the ESP can function as a credible, accountable and effective mechanism for managing workforce, skills and supply chain outcomes throughout the construction phase of the Project.	The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained within NPS EN-1, specifically paragraph 5.13.12. The Applicant responded to SCC's comments in REP6-167 in Appendix G of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]**. Requirement 15 of **3.1 Draft DCO [Revision H]** had therefore been amended at Deadline 7 to include for the prior approval of the Final Employment and Skills Plan by the relevant county planning authority and Thurrock Council.

Appendix C. Applicant's Comments on Deadline 7 submission by Ardleigh Parish Council and Little Bromley Parish Council [REP7-540]

Appendix C
Applicant's Comments on Deadline 7 submission by Ardleigh Parish Council and Little Bromley Parish Council [REP7-540]

C.1 Overview

C.1.1 The Applicant has reviewed the Deadline 7 submission from Ardleigh Parish Council and Little Bromley Parish Council **[REP7-540]** and provides its response in the table below. Given the length of the submission, and the numerous submissions throughout the Examination by the Parish Councils, which raise similar matters, the Applicant has in some instances summarised the submission in order to respond in a proportionate and appropriate manner.

Table C.1 Applicant's Comments on Deadline 7 submission by Ardleigh Parish Council and Little Bromley Parish Council [REP7-540]

Section	Matter	NG Response
Socio-economics, Recreation and Tourism	The Parish Councils of Ardleigh and Little Bromley (ALBA) are concerned that the Project, including the siting and associated works for the East Anglia Connection Node (EACN), would affect not only land and roads, but also the way residents and visitors use the countryside for recreation, events, walking, cycling, horse riding and local leisure. This paper distinguishes between effects which the Environmental Statement itself identifies as significant residual EIA effects and other effects which are assessed as non-significant, but which remain locally important in functional and community terms.	Issues raised in relation to potential impacts on the way residents and visitors use the countryside for recreation, events, walking, cycling, horse riding and local leisure are noted. The Applicant has assessed impacts relating to these matters in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]** (paragraphs 10.7.81 to 10.7.107 assess impacts relevant to physical activity) and **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]**.
	Permanent loss of recreational asset near Ardleigh The clearest adverse effect is the fishing lake north-west of Ardleigh. National Grid identifies that this asset would require permanent closure and assesses this as a permanent, long-term, moderate adverse and significant residual operational effect. That is a direct admission of significant harm in the Ardleigh area. The assessment should identify precisely which land take, work or operational requirement is responsible for the closure, whether the lake is publicly accessible or membership-based, and, so far as evidence is available, the number and type of users affected. Separate discussions on compensation are referred to, but compensation discussions do not reduce the environmental effect and should not be treated as secured mitigation unless an enforceable replacement facility, equivalent provision or other binding mitigation is identified in the DCO. The Parish Councils therefore challenge any approach which records the recreational loss while leaving the remedy uncertain.	The significant impact on the fishing lake north-west of Ardleigh is identified in Table 15-22 of **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]**. Baseline information known about the operation of the fishing lake at the time of submission of the DCO application is set out in Table 15-15, noting however that no detailed information about angling club operations is available in the public domain (it appears to be leased to a small members fishing club with no public website). Further information about the number of users has been sought from the site operator as part of ongoing discussions. Discussions continue with the landowner and their land agent in respect of the future options and compensation. The assessment undertaken in 6**.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]** has attributed the fishing lake a low sensitivity. As defined in Table 15-2 of the chapter, this is because the fishing lake is primarily a resource of local importance; it is also noted that other angling operations are available within the local area, for example the nearby Ardleigh Reservoir. It is noted that potential significant effects identified for built and other assets are subject to separate ongoing discussions with landowners regarding potential compensation. Individuals directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.
	Public Rights of Way in Little Bromley would be permanently altered The paper identifies effects on several Little Bromley footpaths. The Parish Councils will need to check every PRoW number, closure duration and length of permanent alteration against the latest PRoW schedule and plans, but the present assessment identifies effects on Little Bromley 15, 14, 13 and 7. These include temporary closures, managed access or diversions during highway verge, compound, cable or road widening works, and short permanent alterations including shortening or diversion of sections of the network. Although these effects are generally presented	As noted throughout the examination, the overall strategy is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through appropriate temporary diversions. With regard to Little Bromley 15 and 7, further clarity was provided in item DCO 1.S21 and PROW 1.6 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** which clarified that both PRoW terminate at existing highways that are due to be widened and hence the end sections of the affected PRoW will be permanently stopped up to shorten them slightly where the widened highway extends over them. This shortening would be approximately 10m in length at both PRoWs. In the case of Little Bromley 15 a further 65m of the

Section	Matter	NG Response
	as negligible or not significant in EIA terms, that classification does not answer the local functional concern. In a small rural parish, even short permanent changes may matter because they affect connectivity between routes, perceived safety, accessibility for less mobile users, amenity, and the practical usability of the wider walking network.	PRoW would also be subject to temporary managed access, approximately 3m of which would be contiguous with the stopped up section, and 62m further south. With regard to Little Bromley 14, the PRoW crosses the proposed permanent private access road between Bentley Road and Ardleigh Road at an angle and is therefore proposed to be realigned to provide a safer, perpendicular crossing point. A short 28m length of the PRoW that would otherwise intersect the carriageway at an angle will be permanently stopped up and the PRoW realigned along a diversion approximately 38m in length. The PRoW would also be subject to temporary managed access for approximately 6m either side of the permanently stopped up section. Little Bromley 13 would be affected by temporary managed access for a length of approximately 38m. In all cases the functional PRoW routes would remain connected and available for public use with only short sections of their total length affected by the Project.
	Ardleigh bridleway and equestrian use would be affected Ardleigh 2 bridleway is identified as being temporarily closed, with managed access during haul road construction works. It would also be temporarily closed and diverted for underground 11 kV cable installation. The assessment should specify whether managed access will in fact remain available throughout the relevant works, the standards by which that access will be kept safe for walkers and horse riders, and what alternative arrangements will apply if managed access cannot be maintained. God's House Farm, CO7 7QQ, has been identified as an equestrian stable in Section C but rates its sensitivity as low. That may understate the importance of equestrian activity in this rural area, where users are particularly sensitive to construction traffic, road widening, HGVs, noise, diversions and loss of quiet lanes.	As noted throughout the examination, the overall strategy is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through appropriate temporary diversions, including in relation to Ardleigh Bridleway 2. Details of how this will be achieved and the measures that are proposed to be put in place are contained within **7.6 Outline Public Rights of Way Management Plan [REP7-354]**. Section 5.1 of the document provides information about managing impacts on PRoW in terms of ensuring minimum standards as identified in Paragraph 1 of Schedule 12A to the Highways Act 1980 are met; this includes specific arrangements for equestrian users. Table 3.1 sets out typical management interaction regimes – for managed temporary closures, this states that depending on the level of interaction and user type, for example horses on bridleways, appropriate separation and demarcation (e.g. suitable fencing) will be put in place between construction traffic and PRoW users to ensure the safety of PRoW users. Additional measures may also be required on a case-by-case basis and will be discussed between the Main Works Contractor and the Local Highways Authority PRoW Officer. Sensitivity of God's House Farm as an equestrian stable has been identified as low in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]** due to the fact that it is primarily a local facility. Assessment of impacts on the facility have considered the effect of temporary land-take to install temporary drainage. During construction, it is noted that the majority of the facility would be unaffected enabling continued operation and as such, no significant impact has been identified. However, the vulnerability of equestrian users to construction traffic is noted. Commitment GG05 in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision H]** states that construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the Project. Relevant potential topics are listed in paragraph 4.1 and include interaction with road users, such as pedestrians, cyclists and horse riders. **7.3 Outline Construction Traffic Management Plan [Revision G]** states that every construction vehicle driver will receive a driver information pack which will provide information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway, alongside the appropriate actions.
	Local events depend on quiet rural roads The paper identifies the Little Bromley 10 km Run, the Corbeau Seats Rally and Tour de Tendring. The Little Bromley 10 km Run is an annual local event using roads surrounding Little Bromley and had around 170 confirmed entries in 2025. The Corbeau Seats Rally uses local roads around Ardleigh, Great Bromley, Frating, Great Bentley, St Osyth, Clacton-on-Sea and Tendring. Tour de Tendring is a cycling event using local roads in Tendring. These examples are important because they demonstrate that the rural road network is itself a recreational and community asset. Construction traffic, road widening, abnormal load movements and access	The Applicant is aware of these local events and the role they play in the local community. The Little Bromley 10 km Run, the Corbeau Seats Rally, Tour de Tendring and Ford RideLondon-Essex 100 have all been identified in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]**. It is noted in relation to the Corbeau Seats Rally that this event has not taken place since 2023 and there appear to be no current plans for it to be reinstated, however the event has remained within the assessment of potential effects as part of a precautionary approach. For these events, the Applicant would seek to work with event organisers to minimise disruption, and as such a very low impact is anticipated which would not be significant. Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision G]** details that liaison between the

Section	Matter	NG Response
	restrictions could undermine that function unless event-specific arrangements are defined and secured. **Mitigation for local events is weak** National Grid proposes mitigation measure S05 in relation to events such as the Little Bromley 10 km Run, Corbeau Seats Rally, Tour de Tendring and Ford RideLondon-Essex 100. The present formulation is too weak if it merely states that the undertaker will seek to work with event organisers. The Parish Councils request defined commitments, including consultation with event organisers and affected parish councils by a specified period before each relevant event; a published event-management plan; avoidance of identified event dates where reasonably practicable; safe temporary traffic and access arrangements; clear notice periods; a named community liaison contact; and a dispute-escalation mechanism if agreement cannot be reached.	Main Works Contractors(s) and developments will occur, to ensure a coordinated approach to construction traffic management. This liaison should occur for significant local events within the area of the construction project. These local events could include the 10 km run, the Corbeau Seats Rally and Tour de Tendring.
	Business, supply-chain and reputational effects may be understated Colchester City Council raised concerns that the assessment does not capture supply-chain impacts or reputational impacts on businesses. National Grid's response is that these matters are outside the agreed scope of the assessment. On the present material, the Parish Councils do not put this point as a proven significant EIA effect. Rather, it is a remaining assessment gap. The assessment should identify any particular rural businesses, recreation providers, equestrian facilities, events, visitor activities or access dependent enterprises that may be affected, and should explain whether impacts on reputation, rural setting, access and visitor confidence have been considered. Without that work, a narrow access-based assessment may miss real local economic harm.	The assessment presented in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]** identifies rural businesses, recreation providers, equestrian facilities, events, visitor activities or access dependent enterprises within a defined Study Area that may be affected by the Project either during the construction or the operation (and maintenance) phase. The assessment considers how individual enterprises may be affected, whether by land-take, impacts on access or where potential changes in setting may be relevant (for example where visual effects may be an economic consideration for individual businesses). The assessment has been completed in line with **6.19 Scoping Report - including appendices B to K [APP-296]** and **6.20 Scoping Opinion [APP-297].** Reputational impacts on individual businesses are outside the scope of the EIA. Supply chain impacts during the operation (and maintenance) phase were also scoped out of the assessment, as set out in **6.19 Scoping Report - including appendices B to K [APP-296]** and **6.20 Scoping Opinion [APP-297]**. During construction, **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [REP7-296]** states that, until contracts are let for the construction work, it is not possible to know how much of the construction spend would be within the local economy and that much of the spend is anticipated to go to specialist contractors who may not be based in the local area. **8.13 Outline Employment and Skills Plan [REP7-489]** presents further information relating to key skills and supply chain; section 6.3 relates to the supply chain specifically and includes measures aimed at maximising benefits to local businesses from spending on goods and services, associated with the Project during construction.
	Overall concern for the Planning Inspectorate The assessment accepts one clear significant residual effect: the permanent closure of the fishing lake north-west of Ardleigh. Other effects, including permanent shortening or diversion of Little Bromley footpaths, temporary interference with Ardleigh 2 bridleway, effects on equestrian use, and disruption risks to local events, are generally treated as low, negligible or not significant in EIA terms. The Parish Councils' concern is that those classifications should not obscure their local importance. The Examining Authority should require stronger location-specific commitments for PRoW protection, event management, equestrian safety, construction traffic control, access to rural businesses, and mitigation or compensation for lost recreational facilities. It should also ensure that voluntary community benefits are not treated as a substitute for mitigation, compensation or secured replacement provision for identified harm. **Conclusion:** This assessment confirms that Ardleigh and Little Bromley would experience direct socio economic, recreation and tourism effects from the Project. The most important	In relation to permanent shortening or diversion of Little Bromley Footpaths and temporary interference with Ardleigh Bridleway 2, please see responses above. For significant local events, the Applicant would seek to work with event organisers to minimise disruption, and as such a very low impact is anticipated which would not be significant as detailed within Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision G].**

Section	Matter	NG Response
	admitted effect is the permanent closure of a fishing lake north-west of Ardleigh, which is assessed as a significant residual operational effect. Other effects, including permanent changes to Little Bromley footpaths, temporary effects on Ardleigh 2 bridleway, and potential disruption to locally important rural events and equestrian activity, may be assessed as non-significant in EIA terms but remain important to everyday rural life, connectivity, amenity and community wellbeing. Stronger, enforceable and locally specific mitigation is required before consent is granted, and voluntary community benefits should not be relied upon as a substitute for secured mitigation or compensation for identified harm.	
Implications of the Draft Statement of Common Ground with Tarchon for the East Anglia Connection Node:	*[Applicant note: this section of the submission is summarised]* The Parish Councils raise concern that the SoCG with National Grid and Tarchon highlights uncertainty in the design and coordination of the EACN, and that the ExA must therefore be sure that the DCO application documents are sufficiently robust in assessing all credible interface outcomes and securing sufficient land rights and consents: • As per the SOCG, there remain uncertainties in the EACN design, bay locations and connection interfaces. The Parishes raise concern that the draft DCO may not accommodate all realistic interface outcomes and is therefore insufficient in its worst-case assessment and sought land powers. The Parishes are concerned that such unresolved matters affect a range of environmental topics, compulsory acquisition and construction sequencing, all affecting the local communities, including Little Bromley and Ardleigh. • Responsibilities between Tarchon and National Grid for delivery are not confirmed, which could lead to changes in the proposals (e.g. design change) and cumulative impacts on local communities including Little Bromley and Ardleigh. • Residents and landowners cannot currently understand the final EACN footprint, given the possibility that final interface arrangements may change, and there is concern that further powers may be required which go beyond post-consent design evolution. The Parish Councils request the ExA take a number of actions to address these points, by making requests for information from the Applicant.	An inter-project cumulative assessment has been undertaken for the Tarchon Interconnector project and is presented in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]** with reference DCO15 which has been undertaken in accordance with guidance and is based on information that is currently available. The Tarchon Interconnector project will also need to undertake its own cumulative effects assessment as part of their DCO application. A signed SoCG between the Applicant and Tarchon was submitted at Deadline 7 (see **8.3.62 Signed Statement of Common Ground – Tarchon [REP7-461]**), which provides updates to the Applicant's engagement with Tarchon detailing how interfaces are to be managed as the Tarchon design further develops.
Concerns for Ardleigh and Little Bromley arising from National Grid Document 8.30	This submission responds to National Grid's Rule 17 response, Document 8.30, Response to Rule 17 Letter received 30 June 2026, Final Issue A, July 2026, submitted in the Norwich to Tilbury Project examination, EN020027. It is submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council. The response is important because it confirms that a number of matters remain insufficiently assessed, secured or explained, including as-built information, cumulative effects, landscape compensation or offsetting, local access impacts, employment and skills benefits, and the relationship between voluntary community benefit funding and proper planning mitigation. The principal concern is that Ardleigh Parish Council and Little Bromley Parish Council are being asked to accept a concentration of nationally significant infrastructure and associated construction activity without adequate assessment before determination and without enforceable safeguards specific to the most affected villages. That concern is advanced without prejudice to the Councils' primary objection to the siting of the East Anglia Connection Node in the Ardleigh and Little Bromley area.	The matters of concerns raised pertaining to as-built information, cumulative effects, landscape compensation or offsetting, local access impacts, employment and skills benefits, and the relationship between voluntary community benefit funding and proper planning mitigation are addressed below. With regard to the principal concern identified by Ardleigh Parish Council and Little Bromley Parish Council, the Applicant has provided responses on the concentration of nationally significant infrastructure and associated construction activity in Ardleigh Parish Council and Little Bromley Parish Council in previous deadlines. With regard to promoting the Project as CNP, the Applicant has demonstrated throughout the Examination how the application meets the requirements for CNP, how the mitigation hierarchy has been applied and provided justification towards the approach taken towards mitigation and explained where this is appropriately secured in the **3.1 Draft DCO [Revision H].** This is also set out in **8.34 Applicant's Closing Statement with a Summary of Areas of Disagreement** submitted at Deadline 8.

Section	Matter	NG Response
	The Councils recognise that the project is promoted in the context of the Critical National Priority for nationally significant low carbon infrastructure. However, that does not displace the requirements in NPS EN-1 4.2.23–4.2.27 for compliance with the relevant NPSs, application of the mitigation hierarchy, proper cumulative assessment and case-by-case consideration of impacts and controls.	
	As-built information and underground works The Applicant's position in Document 8.30 is that the draft Development Consent Order does not include a general requirement to provide as-built details to relevant planning authorities, including for underground cable corridors, and it seeks to distinguish examples from other projects on the basis that they involved marine or port-related matters. The matter remains unresolved because the EACN and associated land-based works would create long-term underground and highway interfaces where accurate post-construction information is essential. The information required should include cable alignment, depth, protective measures, drainage interfaces, accesses, easements and reinstatement details. The consequence is practical and continuing: without clear as-built obligations, relevant authorities, landowners, drainage bodies, highway authorities, utilities and those responsible for farming operations and reinstatement would have reduced ability to understand, maintain and hold the undertaker to account for what has been installed. The DCO should therefore secure provision of as-built information to the relevant planning and highway authorities, affected landowners and affected statutory bodies before completion, handover or reinstatement of the relevant works.	**3.1 Draft DCO [Revision H]** includes obligations on the Applicant in the Protective Provisions (Schedule 16) to provide as-built details to the local highways authorities (Part 4, Schedule 16) and National Highways (Part 5, Schedule 16) in respect of underground cables. It also places an obligation on the Applicant to provide as-built details to the Ministry of Defence in connection with pylons (requirement 21 of Schedule 3). The Applicant considers this sufficient to satisfy the concerns raised by the parish councils. The Applicant's position remains that it does not consider a requirement to provide details of cable corridors more widely to be appropriate.
	Cumulative effects remain inadequately controlled The Applicant's position in Document 8.30 is that some significant intra-project cumulative effects have been identified during construction, including effects driven by landscape and visual impacts and impacts on pedestrians, cyclists and horse riders arising from visual effects, noise, access and delay, but it resists a requirement to revisit the cumulative effects assessment after consent when detailed design and construction programming are known. Two points follow. First, the Examining Authority must have an adequate cumulative assessment before making its recommendation, because the planning balance cannot be properly struck if the combined effects of the EACN, overhead line infrastructure, compounds, access routes, traffic and other nearby infrastructure proposals are materially uncertain. Secondly, if consent is granted, review alone is insufficient: the DCO should include enforceable coordination, reporting and corrective-action provisions so that final programmes, routes and designs are managed together and adverse cumulative effects are avoided or reduced in practice.	The Applicant disagrees and maintains that the cumulative assessment undertaken is robust with no uncertainties. A revisit of intra-project effects is not necessary as the assessment has been undertaken on the basis of a set of design parameters, secured mitigation and a comprehensive understanding of likely construction and operation (and maintenance) effects. The DCO already provides for enforceable coordination, reporting and corrective-action provisions where necessary.
	Residual landscape and visual effects, compensation and offsetting The Applicant's position in Document 8.30 is not simply that landscape and visual harm is accepted in general terms, but that specified residual landscape and visual effects cannot be further mitigated owing to the nature of the project and that the mitigation hierarchy therefore leads to offsetting or compensation. That is a material concession where residual effects would be experienced by the communities around Ardleigh, Little Bromley and the EACN-affected area. The unresolved issue is that general discussion of compensation or offsetting does not identify what is to be delivered, where, by whom, by when, or how it will be maintained and enforced. The consequence is that residual harm may be weighed in the planning balance without a secured and locally targeted response. Any compensation or offsetting relied upon should therefore be specific, enforceable and locally targeted, with clear delivery	Following the implementation of mitigation, **6.13 Environmental Statement Chapter 13 – Landscape and Visual [REP7-260]** identifies the significant adverse effects during operation on landscape receptors and on visual receptors. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) however confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines '*and the impossibility of full mitigation in these cases does not countermand the need for overhead line*s'. The Applicant's position has been clear throughout the Examination, there is no requirement in law or policy for landscape harm to necessarily be offset or compensated. This position was set out in detail within item no 5.1a in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** and also most recently in **8.34**

Section	Matter	NG Response
	timescales, funding, maintenance arrangements and consultation with Ardleigh Parish Council, Little Bromley Parish Council and affected residents.	**Applicant's Closing Statement and Summary of Areas of Disagreement**. Without prejudice to this position, the Applicant has responded positively to the ExA's questions on this issue during the Examination and included a mechanism within **3.1 Draft DCO [Revision H]** in the form of Schedule 20 which secures funding for landscape compensation. This mechanism is put forward on a 'blue pencil' basis and therefore can be included should the Secretary of State deem this necessary. The concerns raised in the comment in relation to the delivery of compensation are addressed within the drafting of this Schedule. The wording within this Schedule has been updated and agreed following engagement with the relevant Local Planning Authorities.
	Local routes, rural lanes and public rights of way The Applicant's position in Document 8.30 is to rely principally on the Outline Code of Construction Practice and Outline Construction Traffic Management Plan to address impacts on pedestrians, cyclists, horse riders and local access. The matter remains unresolved because those controls are route-wide and generic, whereas the local network around Ardleigh and Little Bromley includes narrow rural lanes, agricultural accesses, walking routes, equestrian routes and roads not well suited to prolonged construction traffic or repeated disruption. The consequence is that local safety, access, amenity and rural recreation impacts may not be adequately controlled at the places where they arise. The DCO should therefore secure route-specific controls for local roads, public rights of way, walkers, cyclists, horse riders and agricultural access, including limits on construction traffic, advance notice, safe temporary arrangements and a responsive complaints and enforcement process.	The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation and road safety in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [REP7-302]** for all Primary Access Roads (PARs), including Bentley Rd, Ardleigh Rd and Little Bromley Rd, used by construction traffic to access the Project from the SRN/MRN. A summary of significant effects can be found within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310]** which takes into consideration the presence of sensitive receptors and the magnitude of impact for each assessment criteria. This included a qualitative review and assessment of the adequacy of facilities on the PARs in the definition of the sensitivity of the road links. Mitigation measures identified along each PAR have been taken into account when identifying the residual impact of the Project in combination with other committed developments. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. Furthermore, Section 5.2 of **7.3 Outline Construction Traffic Management Plan [Revision G]** sets out the proposed approach to pre- and post-construction surveys. Pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP. **7.3 Outline Construction Traffic Management Plan [Revision G]** and **7.6 Outline Public Rights of Way Management Plan [REP7-355]** are management plans which detail the route specific controls public rights of way management, advance notices, construction traffic monitoring, temporary access arrangements and the complaints and enforcement processes. The documents are secured through Requirement 4 of **3.1 Draft DCO [Revision H]**.
	Employment, skills and supply chain benefits The Applicant's position in Document 8.30 is that the Employment and Skills Plan is a benefit-led document rather than mitigation and that it should not be treated as a formal discharge requirement. The Councils do not suggest that a benefit-led document must necessarily be converted into mitigation. The unresolved issue is the weight to be given to benefits which are not secured with precision. If local jobs, apprenticeships, training and supply-chain opportunities are relied upon in the overall planning balance, but are not measurable, enforceable or locally reported, they should receive correspondingly limited weight. The response also leaves unresolved the cumulative supply-chain pressure from multiple major infrastructure projects in the vicinity, including effects on labour, haulage, accommodation, local roads and local businesses. The ExA should therefore treat unsecured employment	The Parish Councils are correct that the purpose of **8.13 Outline Employment and Skills Strategy [REP7-489]** (OESP) is to establish a framework for maximising employment, skills and supply chain benefits. It is not intended as mitigation because the socio-economic assessments reported in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [REP7-296]** did not identify any significant adverse effects in relation to employment and skills that would have required mitigation. The document does however set out in outline, the measures to be taken to deliver economic benefits and a commitment to work with existing organisations, including other project promoters on matters such as supply chain. At Deadline 7 the Applicant had submitted an updated OESP and draft DCO (current revision **3.1 Draft DCO [Revision H]**). Requirement 15 of the updated Draft DCO included for the Final ESP to be approved by the relevant county planning authority and Thurrock Council prior to the commencement of construction. The delivery of the plan is therefore secured and enforceable.

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	and skills benefits with caution and, if any weight is placed on them, require measurable reporting of local outcomes.	When considering the weight to be given to potential economic benefits in the overall planning balance the ExA is respectfully requested to consider NPS EN-1 Paragraph 5.13.11 and its reference to the consideration of any relevant positive provision.
	Community benefit funding is not mitigation The Applicant's position in Document 8.30 is that a Community Fund of more than £30 million would be available if development consent is granted, but that the fund sits outside the planning and consenting process, is voluntary, is not mitigation and is not used to justify or secure consent. The unresolved issue is the risk of the fund being treated, expressly or implicitly, as soft compensation for planning harm. The consequence is important for the planning balance: voluntary community benefit funding cannot make unacceptable development acceptable and cannot reduce the need for proper mitigation, compensation or enforceable planning controls. The ExA should therefore record expressly that the Community Fund is outside the DCO, voluntary, not mitigation, and not a consideration capable of making otherwise unacceptable development acceptable. Engagement after the close of the Examination cannot provide certainty on eligibility, governance, allocation, priorities or whether the EACN-affected area will receive a fair and proportionate share.	The Applicant maintains the position as set out in **8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132]** and considers this comment to be primarily directed at the ExA. The Applicant does not propose any weight is given to the Community Fund in the planning balance and continues to re-iterate the Community Funds for Transmission Infrastructure: Guidance (2025), which is clear that Community Funds should sit outside the planning and consenting regime. In particular, the guidance sets out that: • Community funds must remain separate from the DCO and planning decision-making • They are not mitigation and cannot be used to justify or secure consent • Community benefits are voluntary and policy-led, rather than legally required National Grid does have a long-standing commitment to the communities it works alongside, and wants to ensure that the areas hosting National Grid infrastructure see lasting and meaningful benefits. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. Community benefit funding is allocated to National Grid for this purpose and is subject to oversight by Ofgem, in accordance with government guidance on community funds. This will include requirements to account for expenditure and demonstrate that funds are used in accordance with agreed regulatory objectives. As a result, while community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime.
	Requested response from the ExA *[a series of requests to the ExA in relation to the above issues]*	The Applicant notes these requests but does not comment, as they are directed to the ExA. A response to the individual points made is provided above.
Noise, Vibration, Traffic and Alternative Solutions	The NVMP shows that Little Bromley faces some of the most severe construction impacts on the route. Ardleigh, although not separately assessed, lies next to Section C works and is exposed to cumulative noise, vibration and traffic effects. The Councils remain concerned that National Grid has not properly explored alternative solutions capable of avoiding or materially reducing these harms. Key Concerns 1.1 Severe Construction Traffic Noise on Bentley Road (Little Bromley) The NVMP identifies Link PAR 30 (Bentley Road) as the only project route with a large adverse construction traffic noise impact. It includes 16 Noise Sensitive Receptors within 50 m; Jasmine Cottage, 1 m from the road, is predicted to experience a +11.4 dB increase above SOAEL thresholds. 1.2 Vibration Risks to Heritage Assets in Little Bromley Two of the five project structures identified as at potential vibration damage risk are in Little Bromley: the War Memorial on Church Road and Haywain on Bentley Road. No detailed protection plan is provided. 1.3 Cumulative Impacts on Ardleigh	With regards to construction traffic noise on Bentley Road, mitigation is secured by commitment NV24 of **7.2 Outline Code of Construction Practice [Revision H]**. With regards to potential damage to heritage assets, further detailed assessment and associated mitigation is secured by commitments NV01, NV03, NV04, and NV05 of **7.2 Outline Code of Construction Practice [Revision H]**. With regards to construction noise and vibration effects in Ardleigh, these have been appropriately assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [REP7-284]**. Further detailed construction noise and vibration assessments, together with associated mitigation, monitoring and reporting, is secured by commitments NV01, NV03, NV04, and NV05 of **7.2 Outline Code of Construction Practice [Revision H]**.

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	Ardleigh is not named in the NVMP, despite lying beside the Bentley Road traffic corridor, the EACN substation construction zone, and Section C haul roads, compounds and access tracks. The NVMP confirms 47 Noise Sensitive Receptors across the project face cumulative noise impacts where activities overlap. Ardleigh should therefore receive a parish-level cumulative assessment.	
	Alternative Solutions Required The NVMP relies on generic Best Practicable Means, later Main Works Contractor review, and mitigation after impacts have been identified. This is reactive rather than preventative. Bentley Road is a narrow rural lane with homes as close as 1–5 m from the carriageway. The NVMP identifies a severe impact from HGV construction traffic but does not explain why alternatives were rejected. Alternatives requiring assessment include temporary haul roads, A-road access points, phasing to reduce peak flows, satellite compounds, quieter methods near Ardleigh, and design changes to avoid vibration risk to the War Memorial and Haywain. For Ardleigh, alternatives such as relocating compounds, adjusting haul road alignments and reducing overlapping construction activity have not been properly explored.	**Access alternatives:** Four options for collaborative access with the North Falls and Five Estuaries were assessed with the aim of reducing potential impacts of all three projects. These are provided within Table A16 4.1 Construction Effects within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310]**. For all four-options, junction capacity assessment was undertaken and required proposal of highway design and mitigation measures. The likelihood of the wider impacts and benefits of each option was qualitatively assessed as part of distinguishing each option preference and reviewed by environmental consultants. Three options looked at alternative access off the A120, these all required a new offline haul road with associated land take to link to the Wind Farms haul road, whereas Bentley Rd maximises utilisation of the public highway, albeit with some widening and NMU provisions required. For these reasons, Bentley Road is the most suitable and viable access for the EACN. In terms of the temporary haul road, alternatives are limited due to routing accesses in parallel to sections of underground cable corridor and adjacent to the overhead lines. This is rather than, for example, routing around the edges of fields, which would increase length and therefore the required volume of haul road materials. The Applicant has reviewed available locations for construction compounds to support the installation of the Project. These compounds are necessary for safe and efficient construction of the Project, including providing welfare facilities and storage for plant and materials. The compounds have been positioned with consideration to their setting but also their proximity to primary access routes and the proposed works to construct the Project. Further information regarding the temporary construction compounds is set out in **6.4 Environmental Statement Chapter 4 - Project Description [REP7-160]** (paragraphs 4.8.2 to 4.8.11). Moving the compounds which are currently adjacent to the proposed EACN Substation would significantly increase construction vehicle movements from the compound to the associated work sites. Further detailed construction noise and vibration assessments, together with associated mitigation, monitoring and reporting, is secured by commitments NV01, NV03, NV04, NV05, and NV24 of **7.2 Outline Code of Construction Practice [Revision H]**. The approach is not reactive but is preventative as it ensures that specific measures and controls, agreed with the relevant local planning authority, are in place that are appropriate based on the specifics of the site and any methodologies used.
	Requests to the Examining Authority *[a series of requests to the ExA in relation to the above issues]*	The Applicant notes these requests but does not comment, as they are directed to the ExA. A response to the individual points made is provided above.
Impact on the archaeology of Scheduled Monument (1002146) and the Ardleigh Cropmark Complex	*[Applicant note: due to the length of the report, it is summarised below.]]* Report relating to two heritage assets in the ALBA area, Scheduled Monument (SM) (1002146) 'Crop mark site S of Ardleigh' and Ardleigh Cropmark Complex. The report asserts that: • The Project would cause harm to the setting of the SM and ALBA dispute the Applicant's assessment conclusion of a minor adverse, non-significant operational effect	The Applicant notes the matters raised regarding Scheduled Monument 1002146 and the Ardleigh Cropmark Complex. These matters have been considered and addressed on a number of occasions throughout the Examination and in previous submissions, including in relation to effects on setting, archaeological potential, baseline information, survey requirements and proposed mitigation. In particular, **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [REP7-474]**, **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]** and **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** addressed in detail matters relating to the assessment of setting and heritage effects,

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	• Visualisations relating to the SM have been requested by ALBA on multiple occasions but not been provided by the Applicant • The SM is part of a wider area of significant archaeological interest, the Ardleigh Cropmark Complex, which would be intersected by the Project. ALBA consider the wider Cropmark Complex to have potential to demonstrate equivalent significance to the SM and therefore NPS EN-1 (2023) sections 5.9.5. and 5.9.6 are of relevance, whilst recognising field evaluation and expert assessment would be required to confirm the equivalence of the Complex. • ALBA has highlighted the archaeological potential of the Complex to the Applicant since 2022 however the Applicant has not sought to avoid harm through amended routing. Maps submitted by the Applicant have only included the Complex since Examination commenced and ALBA consider the maps still miss some important information in respect of non-designated heritage assets. • ALBA consider geophysical survey in Ardleigh to be insufficient and has communicated this to the Applicant since 2024; ALBA consider the baseline information is insufficient. • ALBA consider the ExA should address this matter by requiring the Applicant to undertake various actions specific to the SM and Cropmark Complex sites, including providing visualisations, further evidence that the evaluation of the sites has been sufficient; further information on the works affecting the Cropmark Complex and further controls of such works secured via the DCO.	visualisations, archaeological potential, baseline information, survey requirements and mitigation in respect of Scheduled Monument 1002146 and the Ardleigh Cropmark Complex. The Applicant has also repeatedly explained throughout the Examination that the historic environment baseline, assessment methodology and scope of archaeological investigation were developed through consultation with relevant stakeholders, including Historic England, and informed the assessments presented within the Environmental Statement. Where previous submissions are referenced, this is intended to direct the Examining Authority to the documents in which the Applicant's assessment, evidence and reasoning are set out in detail, rather than to unnecessarily duplicate material across multiple submissions. The Applicant therefore relies upon and reiterates its previous and current submissions in relation to these matters.
Health and Wellbeing Impacts	This submission addresses Environmental Statement Chapter 10 as it affects Ardleigh, Little Bromley and the East Anglia Connection Node (EACN). The Parish Councils understand the relevant document reference to be Environmental Statement Chapter 10, Health and Wellbeing (EN0200027-003814), but ask that the Applicant confirms the correct and consistent reference because it appears inconsistently formatted in the examination material. Although the ward is within the Local Study Area, the assessment is drawn at too broad a geographical scale. Ward-wide averages risk masking local effects on named receptors, roads and settlements, including homes close to the EACN, Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane, local public rights of way and the settlements of Ardleigh and Little Bromley.	The Applicant confirms that the correct reference for the Health and Wellbeing assessment is **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]**. As set out in the methodology, the assessment has been undertaken at population, rather than individual level. Effects are therefore presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant (for example to understand potential impacts on a local geography such as in relation to physical activity or impacts on visual setting). The Applicant considers that the assessment has been completed in line with appropriate guidance (e.g. IEMA, WHIASU) and is both proportionate and robust.
	Construction traffic and rural road safety are significant local concerns. Primary Access Route 30 on Bentley Road is identified as having potential for a large negative construction traffic noise impact, with a significant effect at a residential receptor before mitigation. The causal sequence requiring examination is clear: construction traffic and associated noise on narrow rural roads would expose residents, walkers, cyclists, horse riders and other road users to changes in safety, noise and accessibility; those changes may affect health determinants such as perceived safety, sleep, stress, access to services, physical activity and social contact; and those determinants may in turn affect wellbeing and, where evidence supports it, health outcomes. Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane and nearby lanes should therefore be assessed by reference to the receptors and users actually exposed, not only by reference to population-level conclusions.	As noted in the response above, health and wellbeing effects are reported at population-level, which is in line with guidance and good practice for an assessment of this nature and scale. In order to inform the conclusions of the assessment, **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]** has drawn on detailed information where appropriate from other environmental topics which provide more place-specific evidence. As part of embedded mitigation, the Applicant has proposed temporary off-carriageway provision for pedestrians and cyclists in the form of a shared footway adjacent to Bentley Road and Ardleigh Road with a suitable crossing provided as part of the design (along PAR 30). This is in addition to a temporary speed limit at 30mph from Ardleigh Road to Paynes Lane junction, temporary traffic signals and/or temporary road closure (to be confirmed with LHA) and construction and operation of new permanent road widening including new landscaping /grass verges. The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation and road safety on Bentley Road (PAR 30) in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [REP7-302].** It was identified within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310]** that there would be no significant effects as a result of the Project when mitigation measures detailed above and as set out within

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		Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision G]** have been taken into consideration. Further detailed construction noise and vibration assessments, together with associated mitigation, monitoring and reporting, is secured by commitments NV01, NV03, NV04, NV05, and NV24 of **7.2 Outline Code of Construction Practice [Revision H]**.
	Noise, vibration and operational effects require receptor-level assessment. The stronger factual foundation for this issue is the evidence on Bentley Road and operational noise, rather than a general assertion that all amenity effects are clinical health effects. Construction noise, construction traffic noise, vibration and long-term EACN operational noise may affect residential amenity, sleep, stress and wider wellbeing where receptors are sufficiently exposed. The Parish Councils therefore ask for receptor-specific assessment, clear operational noise limits, transparent monitoring and enforceable controls for affected homes and sensitive routes	Operational noise from the proposed EACN substation is assessed in **6.14.A3 ES Appendix 14.3 – EACN Operational Noise Assessment [REP7-290]**. Noise limits are secured in requirement 14 of **3.1 Draft DCO [Revision H]**. Mitigation, together with detailed operational noise assessments to be submitted and agreed with the local planning authority and post-commissioning noise compliance monitoring is secured by commitment NV21 of **7.2 Outline Code of Construction Practice [Revision H]**.
	Mental wellbeing, visual amenity and sense of place are not assessed locally enough. The EACN, overhead lines, pylons, compounds, haul roads, lighting and vegetation loss would alter the rural character of the area. These effects should be characterised carefully: some may be health determinants, but others are properly described as effects on wellbeing, residential amenity, community confidence and sense of place. The Applicant's own terminology should be used where it has identified properties or locations approaching the threshold at which living conditions would become unattractive, with the precise wording and reference supplied in the final version.	**6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 and REP7-270]** (RVAA) undertakes an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. The RVAA concludes that there are no instances where effects on residential visual amenity for individual properties within the Ardleigh and Little Bromley Parishes would be so great that they would render those properties unattractive places to live. **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 2 [REP7-270]** was submitted at Deadline 7. This document came to the same conclusion as the RVAA. Impacts on mental health and wellbeing as a result of changes to visual amenity and the impact that may have on perceptions of place, are presented for both the construction and operation (and maintenance) phase of the Project in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]**. This assessment draws on the findings of **6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 and REP7-270]**. The assessment concludes that there would be a minor adverse (not significant) effect on general and vulnerable populations as a result of changes in visual amenity during operation, but also notes that the capacity of individuals to respond to change may differ, and that research suggests that the mental health impact associated with new infrastructure can change over time, particularly with prolonged exposure. The Applicant considers that the assessment appropriate for the scale and nature of the Project and its findings are robust.
	Vulnerable residents and access to services should be considered at receptor and settlement level. The Parish Councils do not need to assume that particular vulnerable individuals will be present without evidence. The point is that children, older people, disabled people, people with health conditions, people without access to a car, low income households, pedestrians and cyclists may be more sensitive to disruption where rural communities rely on a small number of roads, services and informal support networks. If the Applicant disputes the presence or sensitivity of such receptors, that is a reason for a receptor-sensitive addendum, not for relying on ward level averages.	The Applicant has assessed the impacts on access to services and community infrastructure in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]**. The Applicant has, through baseline assessment presented in **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [REP7-238]**, understood the presence of vulnerable groups (including children, older people, disabled people, low-income households) within wards along the Project route. The assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]** concludes that there would be a negligible and not significant impact on both the general population and vulnerable groups such as those identified. **7.3 Outline Construction Traffic Management Plan [Revision G]** contains a range of management measures relevant to rural communities and potential impacts on the road network. No further assessment is considered necessary to understand or mitigate impacts.
	Public rights of way and rural amenity support physical activity, social contact and mental wellbeing. Closures, diversions, construction traffic or perceived loss of safety may discourage walking, cycling and horse riding. The likely pathway is therefore from works and traffic disruption, to exposed recreational users and	The Applicant has assessed the impacts on physical activity in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]**, which has considered the impacts of PRoW closures, diversions and the visual impacts associated with construction activities, on walkers, cyclists and horse-riders. The assessment is informed by **6.15 Environmental Statement Chapter**

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	residents, to reduced perceived safety or accessibility, to potential changes in physical activity, social contact and wellbeing. The assessment should test these effects by reference to the rights of way and settlements actually affected.	**15 – Socio-economics, Recreation and Tourism [REP7-296]** and **7.6 Outline Public Rights of Way Management Plan [REP7-354]** which considers potential impacts (in terms of management regime and duration of impact) on individual PRoW along the route. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]** concludes that a relatively small minority of the population would be affected in each ward along the route, although it is noted that some wards would potentially experience a greater level of disturbance. However, alternative routes and provision of recreational areas are generally available for use for the period over which effects are predicted to last. As such, no significant impacts have been identified in relation to physical activity due to the Project is low, and standard good practice construction management measures have been secured in the draft DCO through **7.6 Outline Public Rights of Way Management Plan [REP7-354]** and **7.3 Construction Traffic Management Plan [Revision G].**
	EMF information, reassurance and community confidence also require attention. The Parish Councils do not allege exceedance of ICNIRP limits unless the evidence supports that case. The present concern is whether affected communities have been given adequate information, modelling, reassurance and transparent monitoring arrangements. Even where exposure is predicted to remain below relevant limits, uncertainty or inadequate explanation may affect community confidence and wellbeing.	The Applicant's approach to engagement for the construction phase, specifically for Electric and Magnetic Fields (EMFs) is outlined in **7.2 Outline Code of Construction Practice - Appendix E Community Engagement and Public Information [Revision E]**. This includes: • Hosting the latest information and FAQs on the Project website, also signposting to www.emfs.info as well as links to trusted health authorities (such as the World Health Organisation) and scientific bodies • Preparing and sharing an up-to-date information factsheet (alternative formats would be prepared upon requests) with key contacts along the route to facilitate access • Responding to queries via our usual channels of communication (hotline, email address, freepost) The Applicant has updated **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information [Revision E]** at Deadline 8 to provide details about a dedicated EMF helpline. The EMF helpline is an answer phone service run by EMF specialists within National Grid. Members of the public can leave their details and one of National Grid's EMF specialists will call the enquirer back within 3 working days between 9 am and 5 pm (excluding weekends) to discuss the issue. The specialist will be able to provide details of EMF exposures at specific properties and have knowledge of the science and policies regarding EMF. Calls, emails and letters from members of the public can be received 24 hours a day, 7 days a week.
	Main Gaps Requiring Examination The principal weakness is reliance on a ward-level approach. Ardleigh and Little Bromley are treated as one broad receptor, with insufficient settlement-level and receptor-level analysis of vulnerable groups, traffic safety, public rights of way, EACN operational noise, EMF information and cumulative effects. The cumulative issue should not be presented as a mere list of other projects. The point is that prolonged uncertainty, overlapping construction periods, repeated traffic disruption, repeated changes to rural amenity and the cumulative loss of community confidence may operate together on the same receptors and settlements.	The assessment presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP7-236]** is in line with appropriate guidance (e.g. IEMA, WHIASU) and is considered by the Applicant to be both proportionate and robust for a Project of this scale and nature. The chapter sets out that the assessment has been undertaken at population, rather than individual level, with effects presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant (for example to understand potential impacts on a local geography such as in relation to physical activity or impacts on visual setting). The assessment of cumulative effects is typical of a NSIP project, follows the Planning Inspectorate's guidance together with the scope outlined in **6.19 Scoping Report [APP-296]** and agreed in **6.20 Scoping Opinion [APP-297]**. The Applicant acknowledges issues relating to prolonged uncertainty and impacts on local communities as a result. To help overcome issues associated with anxiety caused by uncertainty, an additional commitment has been included within **7.2 Outline Code of Construction Practice [Revision H]** relating to preparation of a detailed Communication Strategy. Further detail relating to a complaints procedure has been included within **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]**.
	Requested Actions for the Examining Authority *[a series of requests to the ExA in relation to the above issues]*	The Applicant notes these requests but does not comment, as they are directed to the ExA. A response to the individual points made is provided above.

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Environmental Statement EN020027-003941 and EN020027-003942	Ardleigh Parish Council and Little Bromley Parish Council submit this joint summary to highlight continuing concerns about the proposed East Anglia Connection Node (EACN), including its siting, access arrangements, heritage implications and cumulative impact. The Councils consider that the Applicant's assessment does not yet distinguish with sufficient clarity between the existence of archaeological remains, their heritage significance, the anticipated magnitude of impact upon them and the resulting assessed effect. The Councils' concern is not that the mere presence of remains automatically produces a significant effect, but that the Environmental Statement should explain, with local specificity, why the assessed effects are said to be acceptable and how residual risk will be controlled. Purpose and Overall Position The Environmental Statement confirms that the EACN and associated works sit within a sensitive historic environment, not a blank agricultural landscape. The impacts extend beyond the substation footprint to underground cable works, pylons, haul roads, compounds, attenuation and drainage works, access and bellmouth works, highway mitigation and rural lanes. The Councils submit that these combined effects require a clearer, asset-by-asset explanation of the baseline relied upon, the significance attributed to identified remains and historic landscape features, the magnitude of impact from each relevant work activity and the consequential effect after mitigation.	The Applicant reiterates that the assessment of the historic environment in the Ardleigh area and reported in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [REP7-244], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [REP7-254],** and **6.11 Environmental Statement Chapter 11 - Historic Environment [REP7-240]** is appropriate and proportionate within the DCO framework. The assessment was undertaken in full compliance with agreed methodology as set out in **6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242],** and endorsed by Tendring DC (**5.9.7 Signed Statement of Common Ground - Tendring District Council [REP7-106]**). The Applicant has nothing to add to the findings presented in the referenced documents. All access for the EACN have been assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [REP7-302]**
	1.Heritage sensitivity and confirmed archaeology Ardleigh is identified as part of an important multi-period archaeological landscape. The Scheduled Monument referred to in the Environmental Statement should be checked against the official list entry, including its correct name and list-entry number, as the current formatting appears uncertain. The Councils understand the relevant cropmark complex south of Ardleigh to include Bronze Age funerary activity, Iron Age settlement evidence and extensive Romano-British occupation. Chapter 11 also identifies Site 01 as covering the new EACN Substation and associated works east of Ardleigh and north of Little Bromley Road. The Environmental Statement should give the precise Chapter 11 paragraphs, gazetteer entries, trench references and figure references for the archaeological evidence relied upon. Trial trenching is said to have revealed four phases of activity, including Bronze Age, Iron Age, medieval and post-medieval features. That evidence demonstrates the existence of remains and requires a clear explanation of their significance, but it should not be treated as a substitute for the separate assessment of magnitude of impact and resulting effect.	Assuming the IP is referring to the scheduled monument 'Crop mark site S of Ardleigh' (NHLE 1002146), the Applicant can confirm that its correct name and NHLE is used throughout the ES historic environment assessment documents noted in the Applicant's comment above. With regard to the rest of the IP's comments, the IP is referred to the Applicant's response above.
	2. Cropmarks, possible Roman road evidence and wider historic landscape The EACN geophysical survey identified former field boundaries, possible enclosures, trackways and a geophysical interpretation of possible Roman road evidence. Unless and until confirmed by excavation, that evidence should be described as an interpretation rather than as established Roman road remains. The priority survey corridor from the River Stour valley to the EACN extends for more than 10 km and includes cabling, pylons, compounds, SuDS basins, crossings, attenuation and temporary haul roads. The cropmark complex south-south-east of Ardleigh and south of Little Bromley Road should therefore be assessed as part of a wider historic landscape. The Environmental Statement should make clear which works threaten which features, including substation foundations, cable trenching, drainage, access works, compounds, landscaping and temporary construction activity.	With regard to the IP's first paragraph, the geophysical survey of the EACN found no evidence of the possible Roman road suggested by the Essex HER cropmarks (**6.11.A3 Environmental Statement Appendix 11.3 - EACN Substation Geophysical Survey Report [APP-211]**). The subsequent archaeological evaluation (trial trenching) **6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [APP-213]** found no evidence of a road of any date in that location. With regard to the IP's second paragraph, the IP is referred to the Applicant's response to the IP's first comment on *"Environmental Statement EN020027-003941 and EN020027-003942"* above.

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	3. Little Bromley access, protected lanes and rural character Little Bromley Parish Council remains concerned that the EACN access strategy places disproportionate construction and operational burden on narrow rural lanes. The Environmental Statement identifies protected lanes of medieval date within Section C, but the Councils ask that each relevant lane be identified by status, location and relationship to the proposed access works. The heritage harm relied upon should also be explained with precision: for example, whether it arises from widening, bellmouth construction, traffic intensity, HGV movements, permanent access alterations, loss of historic alignment, erosion of rural character or cumulative change in the setting of the lanes. For Ardleigh and Little Bromley, these lanes are part of the historic rural landscape and should not be treated simply as construction routes.	The optioneering undertaken when developing the EACN Access Strategy and the need to use Bentley Road and Ardleigh Road is detailed above. The Applicant notes that the purpose of the private permanent access off Bentley Road is to remove the need for HGVs and AIL traffic to travel through Little Bromley Village. The Applicant may also be able to utilise the North Falls and Five Estuaries private access to further reduce HGVs using local roads if programmes align. The protected lanes in Ardleigh and Little Bromley have been assessed in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP7-242]**, and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [REP7-244]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [REP7-254**] and the last of these documents describes how the protected lanes might be impacted. Where the Project has the potential to impact one of these assets, measures to minimise any impact are set out in **7.2 Outline Code of Construction Practice [Revision H]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision D]**. As stated in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [REP7-266]** and **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [REP7-264]** significant adverse effects have been identified during operation within VRA C13 Little Bromley and LCA 7a Bromley Heaths related to the EACN and overhead line. No significant landscape or visual effects are identified during operation in relation to the permanent EACN access.
	4. Little Bromley War Memorial vibration risk Chapter 11 identifies Little Bromley War Memorial as the historic structure with potential for damage from construction vibration. The Councils maintain their concern that this sensitive community heritage asset should be protected by enforceable pre construction condition surveys, vibration limits, monitoring requirements, halt-work procedures and repair obligations. The detailed vibration controls are addressed in the Councils' noise paper and are not repeated here. The Councils' criticisms should be understood as distinct. The Examining Authority is asked to require the Applicant to clarify whether it says the baseline is complete, whether the significance of identified remains and historic landscape features has been correctly characterised, whether the magnitude of impact from the EACN and associated works has been properly assessed and whether the proposed mitigation is sufficient. Those questions should not be elided: an adequate baseline does not necessarily answer significance; an acknowledged impact does not necessarily establish its magnitude; and a proposed mitigation strategy does not itself demonstrate that the residual effect is acceptable.	With regards to potential damage to heritage assets, further detailed assessment and associated mitigation is secured by commitments NV01, NV03, NV04, and NV05 of **7.2 Outline Code of Construction Practice [Revision H]**. The Applicant has addressed this matter in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [REP7-474]** and in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP7-479].**
	5. Cumulative infrastructure burden and alternatives Ardleigh and Little Bromley are now facing a growing concentration of energy infrastructure, including the EACN, Five Estuaries substation, North Falls substation, Tarchon interconnector, the existing Little Bromley substation and an approved battery storage facility. The Councils submit that cumulative effects on heritage, landscape character, tranquillity, rural identity and community cohesion have been materially underestimated. The Applicant has not provided a sufficiently transparent comparative appraisal of reasonable alternatives to the EACN location, design and access arrangements, including opportunities to reduce, relocate or consolidate impacts.	The cumulative assessment is set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].** An update was published at Deadline 4 and revised at Deadline 7 in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]** These documents set out and explain the Applicant's approach to cumulative assessment including which projects fit the definition of a project that ought reasonably to be considered for that assessment. The updated landscape and visual cumulative assessment in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP7-314]** takes into consideration projects in the vicinity of Ardleigh and Little Bromley including the Five Estuaries Offshore Wind Farm (DCO8), North Falls Offshore Wind Farm (DCO9), a Battery Energy Storage System (T3) and the Tarchon Interconnector Project (DCO15), based on the best information currently available. The potential for significant cumulative landscape and visual effects is identified within Landscape Character Area (LCA) 7A Bromley Heaths and Visual Receptor Area (VRA) C13 because of the

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		Project in addition to these others. The Applicant has not underestimated the potential for cumulative landscape and visual effects as these are reported as significant. The Applicant has previously responded to EACN siting concerns related to landscape and visual matters in Section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
	Requested Actions for the Examining *Authority [a series of requests to the ExA in relation to the above issues]*	The Applicant notes these requests but does not comment, as they are directed to the ExA. A response to the individual points made is provided above.
Design Approach for Site Specific Infrastructure	Ardleigh Parish Council (APC) and Little Bromley Parish Council (LBPC) submit this joint Deadline 7 representation in response to the Applicant's Design Approach for Site Specific Infrastructure (DASSI), Revision D. The DASSI usefully establishes the scale and permanence of the proposed East Anglia Connection Node (EACN) near Ardleigh, including a new 400 kV AIS substation, permanent access arrangements and mitigation. However, the Parish Councils consider that the site-specific design approach remains insufficiently justified, inadequately controlled and responsive to the cumulative effects already identified for the Ardleigh–Little Bromley Area (ALBA). The principal concern is the cumulative burden placed on ALBA by multiple energy projects, cable corridors, construction compounds and access routes. That criticism is directed to the overall application as well as to the DASSI. In relation to this paper, the concern is that the DASSI does not demonstrate how those established cumulative effects have influenced the site-specific design, siting, access, lighting, landscape and mitigation proposals for the EACN.	The Applicant considers **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]** (DASSI) does adopt a site-specific design approach for the proposed EACN. The DASSI, which sets out the design principles to be applied (NPS EN-1 (2024), paragraph 4.7.5) would guide detailed design development for the EACN substation in a design responsive way to the proposed cumulative infrastructure. The Applicant refers to the response provided to DES 2.1 b.) in the ExA's second round of written question – see **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** where it set out how the DASSI has been developed alongside the design guide process on the Joint Substation Design Guide (JSDG), identifying where coordination has already occurred and where further alignment is needed (e.g. cable routeing, drainage and planting zones). The Applicant also refers to section 5.5 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]** that sets out the Substation Design Co-ordination Design Principle which requires the Project to have regard to the conclusions of the Joint Substation Design Guide prepared by North Falls and Five Estuaries. The Applicant would also like to make it clear that adequate controls are in place. **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]** is secured as a certified document under Schedule 19 of **3.1 Draft DCO [REP7-064]**. It should also be noted that the DASSI is not the only control mechanism secured to reduce cumulative effects. There are parallel DCO requirements - ensuring consistent and enforceable cross-project controls (including sharing of information and coordination of works) that are 'embedded' directly within each scheme's DCO. For the Norwich to Tilbury Project this includes the following controls under **3.1 Draft DCO [REP7-064]**: Requirement 4 (a) - code of construction practice; Requirement 4 (b) - construction traffic management plan; Requirement 4 (c) - landscape and ecological management plan; and Requirement 14 (3) - noise investigation protocol; Norwich to Tilbury, North Falls and Five Estuaries have worked collaboratively since the announcement of the grid connection points in 2022 with the objective of minimising the cumulative impacts associated with the projects. The projects will continue to cooperate on a range of matters to facilitate coordination and joint management of project interfaces. The Tripartite Position Statement that is included within Appendix B - Coordination with Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP7-477]** confirms should the Project receive development consent, co-ordination will continue throughout the construction and operational phases. With regards to lighting the Applicant refers to the responses provided at 6.3 in **8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533]** that addresses good design and light control in particular around the EACN. It should be noted that under normal operational conditions there is no lighting requirement for substation sites. Notwithstanding the normal operating position and in response to any infrequent use, the Applicant has nevertheless included measures in the DASSI and made commitments in management plans controlled under Requirements in the DCO to limit and manage lighting.

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		Overall, the DASSI has been developed (alongside other controls secured through the DCO) to ensure it will minimise effects on planned uses near the EACN site by the application of good design principles, which has involved the sharing of details on the layout of the project in accordance with paragraph 5.11.23 of NPS EN-1 (2024).
	1.1 Scale and siting of the EACN The EACN would be a major new 400 kV AIS substation near Ardleigh, adjacent to Lawford 132 kV substation. The Applicant should verify whether the stated 550 m × 230 m extent represents the operational footprint, the maximum parameters, an indicative layout or another boundary. The Parish Councils are also concerned that the base height of proposed structures and any permitted upward limit of deviation should be stated separately. It is insufficiently simply to describe structures as being "up to 15 m" if additional vertical deviation may still be authorised. On the worst-case basis, the siting and parameters would make Ardleigh a major inland energy hub for Tarchon Interconnector, North Falls and Five Estuaries. The Parish Councils consider this siting disproportionate and insufficiently justified.	The Applicant confirms that the stated dimensions of 550 m x 230 m for the EACN Substation represent the operational footprint, excluding any requirement for landscaping, drainage and cable/overhead line connections, this is illustrated in the indicative layout plan for EACN Substation in **2.6.1 Design and Layout Plans - Subs & Cables [REP6-020]**, AENC-MMAC-ENG-DWG-0085-14. Furthermore, indicative elevations for EACN Substation are also provided in **2.6.1 Design and Layout Plans - Subs & Cables [REP6-020]**, AENC-MMAC-ENG-DWG-0085-15. The description of the proposed new EACN Substation is set out in **6.4 Environmental Statement Chapter 4 - Project Description [REP7-160]** (paragraphs 4.9.17 to 4.9.22), this is reiterated in paragraph 1.3.26 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]**. As stated in paragraph 1.3.26 '*the substation equipment and gantries would be up to a maximum height of 15 m above the finished ground level and an upward vertical LoD of 10%'.* The vertical limits (in relation to height) are defined in Article 5 of the DCO (**3.1 Draft DCO [Revision H]**) and presented in Parameter Tables within the **2.3 Works Plans - Section C [REP7-017]**. Section 4.2 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]**, proceeds to provide an illustration of the EACN Substation and explains the function of the various elements required. Section 5 of the DASSI sets out the design principles that led to the development of the substation layouts, and explains where there is scope for variation within the design and how elements of the substations will look. The areas where there is no scope for variation are due to specific equipment required to meet technical and safety standards and therefore cannot be altered. GEN2.3 in the ExAs Second Written Questions asked the Applicant to explain how the number and scale of other nearby projects that have been or are yet to be constructed at certain sites such as the proposed East Anglia Connection Node (EACN) compares with those for other linear projects – a response was provided in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**. In addition, a cumulative assessment of the clustering at the proposed new EACN Substation is provided in **6.17.1 Environmental Statement Chapter 17 – Cumulative Response Update [REP7-314].**
	1.2 Permanent access road and traffic impacts The proposed permanent access road between Bentley Road and Ardleigh Road would cut across agricultural land and introduce a major transport intervention into Ardleigh. The Parish Councils' concern is not only traffic volume. The DASSI should explain the engineering and environmental consequences of the access proposal, including road width, junction treatment, severance of agricultural land, effects on farm operations, lighting, drainage, operational use and the relationship with Abnormal Indivisible Load movements. Its use for abnormal loads and operational access has not been justified against reasonable alternatives, strategic road options or a coordinated approach that avoids rural lanes.	In relation to the crossing of agricultural land, the Applicant has, in response to landowner feedback, moved the proposed permanent private access road so that it follows the edge of a landholding. This change moves the section of permanent private access road closer to this boundary and avoids crossing a larger field. The Applicant does not consider that the proposed permanent private access road between Bentley Road and Ardleigh Road would constitute a major transport intervention. It would comprise of a relatively short section of road that would not form part of the public highway network and would not alter highway capacity or traffic patterns in the area. Its purpose is to provide access to Project infrastructure and, as such, it is appropriately characterised as ancillary infrastructure. Whilst the proposed permanent private access road would be used by vehicles associated with regular inspection and maintenance activities, operational traffic levels are expected to be low. Importantly, the access road would provide a dedicated access route to Project infrastructure, avoiding the centre of Little Bromley village. The engineering and environmental consequences of the access proposal are set out in **5.15 Design Development Report [REP7-150]** and various chapters of the Environmental Statement, primarily **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [REP7-172]**. Note that

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		the Applicant has committed in **7.2 Outline Code of Construction Practice [REP7-322]** to mitigation measures relating to agricultural land and farm operations. The engineering aspects of the access proposal will be submitted for approval to Essex County Council as part of the technical approval process set out in Schedule 16 Part 4 of **3.1 Draft DCO [Revision H]** and therefore it is not considered necessary to provide further technical details in the DASSI. In terms of alternatives, a long list of nine access options was identified, considering access from the A120, the A137 and the A12. The proposed permanent private access road was identified as the preferred solution for both operational access and the accommodation of Abnormal Indivisible Load movements. The other eight access options were discounted for a range of reasons including highway constraints and residential property impacts.
	1.3 Cumulative effects on ALBA The DASSI is not the proper document in which to provide the whole cumulative assessment for ALBA. However, its design approach should demonstrate how the established cumulative effects of the EACN, cable corridors, CSE compounds, construction traffic, o shore wind connections and the Tarchon Interconnector have informed the site-specific design. It does not do so. That is a major deficiency because communities experience these projects collectively, not in isolation, and because a design document should show how cumulative impacts have translated into practical design constraints and mitigation.	The Applicant disagrees that the cumulative effects assessment is deficient and the understanding of how a cumulative effects assessment is to be undertaken is not understood by Ardleigh and Little Bromley Parish Council. An assessment of the two types of cumulative effects – intra-project cumulative effects and intra-project cumulative effects are assessed in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [REP7-312]** and **6.17.1 Environmental Statement Chapter 17 – Cumulative Response Update [REP7-314].** The assessment is typical of a NSIP project, follows the Planning Inspectorate's guidance together with the scope outlined in 6**.19 Scoping Report [APP-296]** and agreed in **6.20 Scoping Opinion [APP-297].**
	1.4 Landscape, lighting and rural character The substation, fencing, lighting and access infrastructure would significantly alter the rural landscape. The DASSI provisions addressing lighting, fencing, planting, external finishes and detailed design should be identified and tested against specific outcomes. At present, the proposed mitigation, including the Environmental Area, habitat management and planting, remains too generic. The Parish Councils seek lower maximum heights, reduced lighting with defined lux limits, directional or motion controlled lighting, recessive external finishes, specified boundary planting dimensions, retention of existing vegetation, fixed access arrangements and coordinated landscape treatment with connecting projects. Broad limits of deviation are prejudicial where the assessed worst case is unclear and unacceptable outcomes remain authorised.	Section 6 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]**, sets out the Applicants approach to detailed design and approval process. The DASSI has outlined the design principles that can be taken forward into the detailed design, sets out the approach to the design of site-specific infrastructure of non-linear works, and details those elements of the design which have some flexibility in their appearance and those that do not. Responses to the specific concerns raised by the Parish Councils are provided below. Landscape mitigation: The Applicant has responded to similar concerns raised by Tendring District Council and Essex County Council against DES 1.2 in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP7-479]**. The Applicant has engaged with other developers who are proposing developments in proximity of the Project, to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both are proposed to connect into the proposed East Anglia Connection Node (EACN) substation. The proposals within the EACN Environmental Area have taken into consideration the landscape and ecology masterplans for North Falls and Five Estuaries substations. The Environmental Areas proposals are indicative and will be finalised at the detail design stage of the Project and included within the final LEMP approved by the local planning authorities. Lighting: An Operational Lighting Management Strategy is included in Appendix B of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373]**. Commitment GG26 in **7.2 Outline Code of Construction Practice [Revision H]**, secures the '*Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats… Within and in proximity to Dedham Vale National Landscape, lighting will be designed and operated substantially in accordance with Dedham Vale National Landscape Lighting Design Guide, Guidance to reduce light pollution and protect our dark skies, July 2023*'. This is reinforced by Commitment LV03, which aligns with the lighting design principles set out in the Dedham Vale National Landscape Lighting Design Guide, July 2023. All lighting will be designed in accordance with the appropriate design standards. The position of lighting columns will be subject to detailed design and will be determined by safety and operational

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		requirements. Lighting would be directional and is intended to support safe movement of pedestrians and vehicles around the site (and minimise light spill to the local environment). The lighting would therefore not be on by default, and only whilst there are activities happening at the site as dictated by operational requirements. Additional task lighting may be required when undertaking specific maintenance activities. Rural Character: The Applicant has responded to similar concerns raised by Tendring District Council as set out in Appendix AD of **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. As stated in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [REP7-266]** and **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [REP7-264]** significant adverse effects have been identified within VRA C12 Ardleigh, VRA C13 Little Bromley and LCA 7a Bromley Heaths as a result of the proposed overhead line and East Anglia Connection Node (EACN) Substation. At year 15 proposed planting within the EACN Environmental Area would be semi-mature, although growth rates would vary depending upon local conditions. This planting would help to integrate the proposed new EACN Substation within the surrounding landscape and would reduce the scale of change for some receptors within a localised area around the substation by screening and filtering views.
	1.5 Impacts on Little Bromley Although Little Bromley is not named directly in the DASSI, associated access and construction traffic would affect its rural road network. The village's narrow lanes, lack of footways and vulnerable residential clusters make continued use as a construction corridor unacceptable without a clear alternative strategy.	The Applicants Construction routing strategy is detailed in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision G].** The Applicant's proposed routing through Little Bromley Parish is detailed in Figure 1 of Page 17 of **7.11 Transport Assessment Appendix I: Figures [APP-342]**. The Applicant is not proposing to route construction through Little Bromley Village, with the use of the Permanent route between Bentley Road and Ardleigh Road. The Applicant has identified highway mitigation measures to allow safe movement of HGVs and AILs, detailed in Sheets 14 and 15 in Section C **7.3 Outline Construction Traffic Management Plan Appendix C: Indicative Traffic Management Plans Section C [REP4-172].** Additionally, the Applicant is proposing, in line with LTN1/20 guidance, a temporary footway on Bentley Road, to allow NMUs to have separation from Bentley Road. The above mitigation measures, and assessments ensure the proposed corridor is acceptable for construction traffic routing for the Project.
	Requested Actions for the Examining Authority *[a series of requests to the ExA in relation to the above issues]*	The Applicant notes these requests but does not comment, as they are directed to the ExA. A response to the individual points made is provided above.
Community Engagement and Public Information	Ardleigh and Little Bromley Parish Council recognises the strategic need for the Norwich–Tilbury reinforcement project. However, its primary position remains that the siting of the East Anglia Connection Node (EACN) at Ardleigh and Little Bromley has not been adequately justified. Communication measures cannot cure an inadequately justified siting decision or substitute for avoidance and reduction of harm. Without prejudice to the Councils' case on siting, effective parish-specific communication must be secured if consent is granted. The mitigation hierarchy requires avoidance and reduction of harm to be considered at an early stage. Alternatives and mitigation are not, however, rigid sequential stages in every case. The point for present purposes is that communication and complaints arrangements must not be treated as a substitute for a properly reasoned siting decision. If the EACN remains proposed at Ardleigh and Little Bromley, Appendix E must be strengthened so that engagement, reporting and escalation arrangements are specific to the parishes most directly affected by the project's largest single construction element.	The Applicant has set out an approach to ongoing engagement and communication, with a commitment to develop a detailed Communications Strategy, that is secured through **3.1 Draft DCO [Revision H]**. The detailed Communications Strategy will set out an approach to active community liaison, to ensure that residents and stakeholders, including local parish councils, are appropriately informed of upcoming construction activities and provided with meaningful and inclusive ways in which to respond/engage. This approach is intended to be proactive, helping people understand what is happening before it happens, rather than only responding to issues or problems once they have occurred. This not to say that a robust complaints procedure should not also form part of the Applicant's approach. The Applicant provided a more detailed complaints management procedure at Deadline 6 within **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]** to address stakeholder's concerns. The Applicant notes the Parish Council's comments regarding the management of complaints, set out in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]**. The Outline Code of Construction Practice provides the overarching framework for community engagement, public information and the management of enquiries and complaints during construction. This framework is supported by the wider suite of management plans, monitoring and reporting mechanisms secured through the DCO Requirements and other commitments within the application documents. The Applicant considers that the current framework

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		provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, where appropriate. While Appendix E does not prescribe the routine sharing of complaint logs or specify notification triggers in relation to individual complaints, the Applicant considers that these matters are appropriately managed through ongoing working arrangements between the construction team, community relations team and relevant local authorities. The Applicant therefore considers that Appendix E provides an appropriate and proportionate framework for managing complaints and community relations during construction and that no amendment is required in response to this representation.
	The Applicant's Case (as presented in Appendix E) Appendix E proposes route-wide engagement measures, including a community relations team, project website, hotline, email and freepost address, site boards, land and property engagement, accessible communications, a complaints process and general information about electromagnetic fields (EMF). Those provisions are too generic for Ardleigh and Little Bromley. In particular, Appendix E does not identify a parish-level liaison route for the EACN; does not require phase-specific briefings tied to the intensity of construction activity; does not require immediate notification of serious incidents, route breaches, unplanned out-of-hours working or material exceedances; does not provide parish-level publication of anonymised complaints and compliance information; and does not secure accessible site-specific EMF information and commissioning results for the affected community. The Councils' Concerns The EACN would involve multi-year heavy works, high HGV volumes, noise, dust, vibration, lighting, land take, landscape change and highways coordination. Ardleigh and Little Bromley therefore require engagement proportionate to that impact. The arrangements should include a named liaison o icer; briefings at a frequency linked to the relevant construction phase, with more frequent briefings during peak EACN activity and reduced frequency when works are limited; weekly forward-look bulletins during active construction; immediate incident notifications; joint traffic communications with Essex County Council; and clear routes for escalation where commitments are not being met.	The Applicant has responded to the Parish Council's comments on **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]** above. In relation to the Applicant's approach to engagement during construction of Electric Magnetic Fields (EMF), the Applicant has updated **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information [Revision E]** at Deadline 8 to provide details about a dedicated EMF helpline. The EMF helpline is an answer phone service run by EMF specialists within National Grid. Members of the public can leave their details and one of National Grid's EMF specialists will call the enquirer back within 3 working days between 9 am and 5 pm (excluding weekends) to discuss the issue. The specialist will be able to provide details of EMF exposures at specific properties and have knowledge of the science and policies regarding EMF. Calls, emails and letters from members of the public can be received 24 hours a day, 7 days a week. If appropriate, for residents close to National Grid assets, additional measures could be offered on a case-by-case basis.
	Complaints and Electromagnetic Fields information The complaints process must distinguish between acknowledgement, investigation, interim response, resolution and escalation. A 48–72 hour final resolution will not be realistic for every complaint, particularly where technical investigation or third-party input is required. However, acknowledgement and initial action within 48–72 hours is both realistic and necessary for construction-intensive parishes. Appendix E should therefore require prompt acknowledgement, identification of the investigation route, an interim response where resolution is not possible within the initial period, a clear target for final resolution, and escalation to a senior project contact where complaints are repeated, unresolved or concern serious impacts. The Councils also request parish-level publication of complaints and compliance information in anonymised form. That publication should identify complaint categories, response times, outcomes, repeat issues, route breaches, material exceedances and any corrective action taken. The Applicant should also be required to notify the Councils immediately of serious incidents, HGV route breaches, unplanned out-of hours working and material exceedances of agreed controls or limits.	The Applicant has responded to the Parish Council's comments on **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]** above. In relation to the proposed response time, the Applicant considers that the timescales currently set out in Appendix E strike an appropriate balance between acknowledging concerns promptly, undertaking any necessary investigation and providing a considered and meaningful response. The framework also allows issues requiring urgent attention to be escalated and addressed more rapidly where circumstances warrant. In addition, the Applicant's approach to engagement for the construction phase, specifically for Electric and Magnetic Fields (EMFs) is set out in **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information [Revision E]**. This includes: • Hosting the latest information and FAQs on the Project website, also signposting to www.emfs.info as well as links to trusted health authorities (such as the World Health Organisation) and scientific bodies • Preparing and sharing an up-to-date information factsheet (alternative formats would be prepared upon requests) with key contacts along the route to facilitate access. • Responding to queries via our usual channels of communication (hotline, email address, freepost)

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	EMF should be addressed carefully. The Councils do not suggest that compliance with applicable exposure standards is irrelevant, nor do they seek to imply an unproven health effect. The concern is that understandable public anxiety requires clear, accessible and site-specific information. Appendix E should therefore commit to EACN specific EMF information, public explanation of the applicable exposure standards, and publication of relevant commissioning results in a form capable of being understood by residents.	• The factsheet produced as part of this approach will be route wide and will include relevant information to the EACN The Applicant has updated **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information [Revision E]** at Deadline 8 to provide details about a dedicated EMF helpline. The EMF helpline is an answer phone service run by EMF specialists within National Grid. Members of the public can leave their details and one of National Grid's EMF specialists will call the enquirer back within 3 working days between 9 am and 5 pm (excluding weekends) to discuss the issue. The specialist will be able to provide details of EMF exposures at specific properties and have knowledge of the science and policies regarding EMF. Calls, emails and letters from members of the public can be received 24 hours a day, 7 days a week. If appropriate, for residents close to National Grid assets, additional measures could be offered on a case-by-case basis.
	Policy, Alternatives and Mitigation NPS EN-1 and EN-5 require community impacts to be minimised, information to be clear and accessible, engagement to be effective, and alternatives to be properly considered. For Ardleigh and Little Bromley, the alternatives assessment remains central to the Councils' case. The Applicant should not rely on communication or construction mitigation as if those measures could themselves justify the Ardleigh and Little Bromley siting. The proper question is whether less harmful options have been fairly assessed, and whether any residual harm at Ardleigh and Little Bromley is then reduced, managed and reported transparently. The Councils maintain that the Applicant must demonstrate that it has properly assessed alternatives capable of avoiding or reducing harm, including locations closer to existing substations, areas with lower residential density, coastal or o shore connection points, and sites with better road access and lower landscape sensitivity. Those options may materially reduce landscape and visual harm, traffic pressure, cumulative infrastructure effects and community disruption. The assessment must be transparent and comparative, not replaced by general assurances about communication or construction management. If consent is granted with the EACN at Ardleigh and Little Bromley, the relevant mitigation and engagement arrangements must be secured in an identified management plan or DCO commitment. They should not be left as narrative assurances in Appendix E. The secured commitments should include parish-specific engagement, the complaints stages identified above, phase-specific briefings, weekly construction updates during active works, Essex County Council highways coordination, immediate notification of serious incidents and material exceedances, accessible site-specific EMF information, publication of commissioning results, and transparent reporting of compliance and incidents.	The Applicant has responded to EACN Substation siting concerns previously in Section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, the Applicant remains confident that the EACN substation siting is justified. The framework, including mitigation measures, set out in **7.2 Outline Code of Construction Practice [Revision H]** and accompanying appendices, including **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information [Revision E]** are secured by Requirement 4 of **3.1 Draft DCO [Revision H].** In addition, there is also a commitment to develop a detailed Communications Strategy, that is secured through **3.1 Draft DCO [Revision H]**.
	Ardleigh and Little Bromley Parish Council's primary position is that the siting of the EACN at Ardleigh and Little Bromley has not been adequately justified and that less harmful alternatives must be transparently assessed. Communication measures cannot cure that deficiency. If, however, consent is granted, the Applicant must be required to secure parish-specific engagement, complaints, incident-notification, compliance-reporting and EMF-information commitments that reflect the scale and duration of the impacts on Ardleigh and Little Bromley. The Councils therefore request that the Examining Authority require Appendix E, or another identified certified document or DCO commitment, to be amended so that these obligations are expressly secured, enforceable and tailored to the parishes most directly affected by the EACN.	The Applicant has responded to EACN substation siting concerns previously in Section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, the Applicant remains confident that the EACN substation siting is justified. The Applicant has responded to the Parish Council's comments on **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E]** above.

Appendix D.
TS Conductor Data

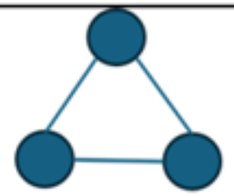
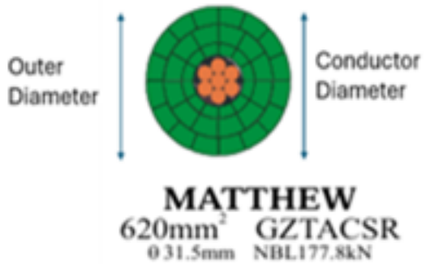
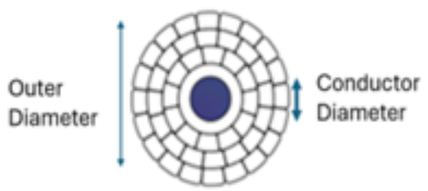
Appendix D
Conductor data relating to response to REP7-568 Pylons East Anglia

Table A2 Conductor Parameters

Conductor Name Earthwire & Phase Conductors	Material	Conductor Outer Radius (mm)	Conductor Outer Diameter (mm)	AC Resistance (Ω/km)	Number of strands.	Resistivity of conductor material (μΩm)
HORSE	ACSR	6.975	13.95	0.3936	12/7	0.2655
FIBRAL/24	Al Alloy /Steel	10.30	20.60	0.163	18/10 +fibre	0.0295
KEZIAH	AACSR	9.765	19.53	0.1654	30/7	0.0295
LYNX (phase)	ACSR	9.765	19.53	0.1586	30/7	0.02826
LYNX (earthwire)	ACSR	9.765	19.53	0.1489	30/7	0.02655
ZEBRA (phase)	ACSR	14.31	28.62	0.0684	54/7	0.02826
ZEBRA (earthwire)	ACSR	14.31	28.62	0.0643	54/7	0.02655
FINCH	ACSR	16.42	32.84	0.0443	54/19	0.02826
COLLYBIA	ACAR	15.16	30.33	0.0589	24/37	0.02826 (Al) 0.0325 (Alloy)
UPAS	AAAC	12.35	24.71	0.0878	37	0.0312
TOTARA	AAAC	14.49	28.98	0.0652	37	0.0312
RUBUS	AAAC	15.75	31.50	0.0558	61	0.0312
SORBUS	AAAC	16.695	33.39	0.0500	61	0.0312
ARAUCARIA	AAAC	18.63	37.26	0.0400	61	0.0312
REDWOOD	AAAC	20.52	41.04	0.03443	61	0.0312
MATTHEW	AACSR	15.75	31.50	0.0478	54/7	0.0287
COMPACT 33.5	AAAC	17.51	35.02	0.0352	46 (Trpz.)	0.0305

Table Ref B Parameters from TGN(E) 166 and TS Conductor Technical Resources Data Sheet (publicly Downloadable)

"14 64 KCMIL_Harvard_AECC_TW_M3_TS"

Conductor Name	Construction Type	Conductor Type	Max Temp	Outer Diameter	Conductor Diameter	AC Resistance	Mass	Diagram	Configuration	Effective Bundle AC Resistance Conductors in parallel	Achievable Rating (Amps) [5000A IEC Max]
ARAUCARIA (AAAC)	All Aluminium Alloy Conductor	Standard	90 °C	37.9 mm	37.9 mm	0.0400 Ω/km	2,269 kg/k		 Triple Bundle	0.0133 Ω/km	5000 A
MATTHEW (AACSR)	Aluminium Alloy Conductor Steel Reinforced	High Temp Low Sag	170 °C	31.5 mm	31.5 mm	0.0476 Ω/km	2,179 kg/km		Double Bundle	0.0238 Ω/km	4720 A
TS_COND HARVARD	Aluminium Encaspsulated Carbon Core	High Temp Low Sag	200 °C	32.8 mm	8.5 mm	0.0407 Ω/km	2,146 kg/km		Double Bundle	0.0204 Ω/km	5000 A

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