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Rule 17 Letter

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1. Introduction

1.1 Purpose of this Document

- 1.1.1 On 14 July 2026, the Examining Authority (ExA) issued a Rule 17 Letter **[PD-031]**, requiring responses to a number of written questions to be submitted by Deadline 7, 21 July 2026. The Applicant provided its response in **8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533]**.
- 1.1.2 A number of Interested Parties (IPs) also provided their responses at Deadline 7. This document provides the Applicant's comments on those responses, where 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.
- 1.1.3 The Applicant has only provided comment to questions that received responses from other parties at Deadline 7; any questions in the Rule 17 Letter directed solely to the Applicant or to which no other party responded, is not included in this document.
- 1.1.4 Where multiple IPs have responded to the same part of the Rule 17 Letter, these may be grouped and responded to once, to avoid repetition. Similarly, where some IPs have provided responses that are identical or materially the same, or have explicitly stated their endorsement of a response by another IP, these are not duplicated, such that one 'lead' response is identified as representing the position of multiple parties; this is the case for many of the Local Planning Authority responses.
- 1.1.5 At Deadline 7, many IPs also provided general representations outside of the Rule 17, and these are responded to separately in **8.4.18 Applicant's Comments on any Further Information or Submissions Received by Deadline 7**. 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.

2. Applicant’s Comments on Responses to July 14 Rule 17 Letter

2.1 Development Consent Order

Table 2.1 Applicant’s comments on Rule 17 matters relating to the Development Consent Order

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
1.1	All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust Natural England	Requirement 11: Biodiversity Net Gain At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) [REP6 030]. In Schedule 3 of [REP6-030] a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend.	Babergh and Mid-Suffolk District Council [REP7-541] Colchester City Council [REP7-549] Braintree District Council [REP7-545] Brentwood Borough Council [REP7-546] Norfolk County Council [REP7-564] Essex County Council [REP7-553] Basildon Borough Council [REP7-544] Chelmsford City Council [REP7-548]	The Council note that the dDCO [REP6-031] has been updated to include a Biodiversity Net Gain Condition, as well as an updated wording in the “interpretation” section of Schedule 3. The Council welcomes the inclusion of a biodiversity net gain requirement within the draft DCO. However, while the Council do not object to the Applicant's "interim/final assessment" approach, which appears pragmatic for a project of this scale, the Council is concerned that Requirement 11 does not provide any mechanism for review, approval or agreement by the relevant planning authority. As currently drafted, compliance with the requirement is capable of being determined solely by the undertaker through submission of the relevant assessments. Given that biodiversity metric calculations require professional judgement regarding habitat classification, habitat condition, distinctiveness, temporal risk and post-development outcomes, the Council considers that the interim biodiversity net gain assessment, final biodiversity net gain assessment and any biodiversity offsetting scheme should be subject to approval by the relevant planning authority, following consultation with relevant ecological advisors where appropriate. Without an approval mechanism, there is no means by which concerns regarding the methodology, assumptions or conclusions of the biodiversity net gain assessments can be formally addressed. Furthermore, the Council considers that the proposed drafting provides limited ability for the relevant planning authority to verify that the biodiversity net gain calculations have been undertaken appropriately prior to any determination that the 10% target has been achieved. The Council considers that an approval mechanism would provide greater certainty, transparency and enforceability. The Council therefore recommends that Requirement 11 be amended so that:	The Applicant welcomes the Councils’ support for the introduction of Requirement 11 and approach to the assessments. The Applicant however does not agree that Requirement 11 should be amended to require approval from each relevant Local Planning Authority (LPA) for Biodiversity Net Gain (BNG) assessments or any Biodiversity Offsetting Scheme and has provided reasoning for this in response to question 1.2 in the Rule 17 letter see 8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533]. Habitat classification, condition assessment, distinctiveness, temporal risk and post-development outcomes have been assessed using the Defra Statutory Biodiversity Metric and documented within 7.1 Biodiversity Net Gain Report [REP7-320]. The methodology has been shared and discussed with Natural England, who raised no objection to the approach, and has been open to scrutiny through the DCO examination process. The Applicant therefore does not agree that there is no mechanism through which methodology, assumptions or conclusions can be reviewed. The Applicant also does not agree there would be no means by which concerns could be addressed post consent. The Local Planning Authorities will receive copies of the assessments and any Biodiversity Offsetting Scheme and therefore will be able to review the information provided and raise any queries with the Applicant. The absence of a formal approval mechanism does not prevent engagement or discussion regarding the documents. The Applicant has committed to establishing an Ecology and Landscape Working Group to facilitate such engagement. Finally, the certainty and transparency required by the Councils is provided in the confirmation report secured by Requirement 11(5).

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				- the interim biodiversity net gain assessment is submitted to and approved by the relevant planning authority; - the final biodiversity net gain assessment is submitted and approved by the relevant planning authority; - where a biodiversity offsetting scheme is required, the scheme is submitted to and approved by the relevant planning authority before implementation; and - no part of Requirement 11 is discharged solely through submission of information. Owing to the above, the Council consider that the requirement would be better suited to say: (i) Prior to commencement of the authorised development, an interim biodiversity net gain assessment must be submitted to and approved in writing by the relevant planning authority. (ii) Within six months of the end of the approved final biodiversity net gain assessment must be submitted to and approved in writing by the relevant planning authority. (3) If the approved final biodiversity net gain assessment demonstrates that less than 10% biodiversity net gain has been achieved overall across the Order land, a biodiversity offsetting scheme must be submitted to and approved by the relevant planning authority before implementation. (4) The approved biodiversity offsetting scheme must be implemented in accordance with the approved details.	
			Essex County Council [REP7-553]	<i>[In addition to the above]</i> This has been communicated to the Applicant, and a response was provided. Concerningly, the Applicant does not agree that the Interim or the final Biodiversity Net Gain Assessment, nor the Biodiversity Offsetting Scheme should be subject to approval. Furthermore, ECC would also continue to echo the need for the delivery of BNG to be subject to spatial parameters to ensure the environment impacted by the development is benefited through BNG in the local area.	In relation to the point regarding offsite BNG being subject of spatial parameters. The Applicant has detailed in Section 3.2.7 of 7.1 Biodiversity Net Gain Report [REP7-320] the risk multipliers that can affect the final biodiversity unit score which includes the spatial location of off-site BNG delivery. It is therefore considered that this matter is already addressed.
			Natural England [REP7-562]	Natural England welcomes the new requirement and has no comment on the wording. It is noted that Overarching National Policy Statement for energy (EN-1) supports an approach of Environmental Net Gain which is broader than Biodiversity Net Gain. Consideration should be given as to whether it would be appropriate to reference this within or alongside the new requirement.	The Applicant welcomes Natural England's comments. The Applicant has acknowledged NPS EN-1's broader support for environmental net gain in 7.1 Biodiversity Net Gain Report [REP7-320] and in the Applicant's commitment to deliver at least 10% BNG with wider environmental and societal benefits across the Project. This is to be secured by using BNG as a catalyst to deliver wider benefits. Whilst the wording of Requirement 11 does not include reference to the wider benefits, this is referenced in Section 1.4 of 7.4 Outline Landscape and Ecological Management Plan [REP7-342] . As the delivery of BNG is main driver for the

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					wider benefits and the Applicant's commitment is expressed in another control document, it is not considered necessary to amend the wording of the requirement.
		South Norfolk District Council [REP7-571]		Requirement 11 of the Draft DCO requires National Grid to submit their interim and final Biodiversity Net Gain Assessments to the relevant LPA. It is requested that 11(1) is amended to read – <i>‘with the exception of pre-commencement works, development shall not commence until the interim biodiversity net gain assessment has been submitted to and approved by the relevant local planning authority/lead LPA (in consultation with the relevant LPAs). Other requirements (e.g. the LEMP) include the wording ‘which must be substantially in accordance with the outline landscape and ecological management plan)’</i>. As drafted’, Requirement 11 does not so it is not clear what will be submitted to the LPA. There also needs to be provision for monitoring and reporting back to the LPA to ensure that the habitats created deliver the 10% BNG required by the DCO. That said, in line with SNDC current BGP informative, and Summary of responses and government response - GOV.UK SNDC have the below suggestion for wording of the BNG Requirement. (1) <i>With the exception of pre-commencement works, development shall not commence until the interim biodiversity net gain assessment has been submitted to and approved by the relevant local planning authority/lead LPA (in consultation with the relevant LPAs) for ‘The interim biodiversity net gain assessment must:</i> <i>a. Include details about the qualifications and experience of the ecologists/other relevant professional who have contributed to the development of the plan</i> <i>b. Include information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat</i> <i>c. A description of any irreplaceable habitat on the land to which the plan relates</i> <i>d. Detail bespoke compensatory measures where irreplaceable habitat is lost</i> <i>e. Clarify the spatial risk multiplier where they cross multiple LPAs</i> <i>f. Evidence of the purchase of habitat, hedge and watercourse units from off-site biodiversity gain providers or purchase of biodiversity credits. Evidence the pre-development biodiversity value of the onsite</i>	The Applicant refers to the response provided in the first row to Babergh and Mid Suffolk District Councils in addition to a number of others above in relation to the matters raised in this response as they largely overlap.

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				habitat on the date of submission of the biodiversity net gain assessment (2) <i>Within six months of the date on which the construction period ends for the authorised development, a final biodiversity net gain assessment must be submitted to, and approved by, each relevant planning authority/lead planning authority.</i> <i>The final biodiversity net gain assessment must:</i> <i>a. Include details about the qualifications and experience of the ecologists/other relevant professional who have contributed to the development of the plan</i> <i>b. Include information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;</i> <i>c. A description of any irreplaceable habitat on the land to which the plan relates</i> <i>d. Detail bespoke compensatory measures where irreplaceable habitat is lost</i> <i>e. Clarify the spatial risk multiplier where they cross multiple LPAs'</i> <i>f. Evidence the pre-development biodiversity value of the onsite habitat on the date of submission of the biodiversity net gain assessment</i> <i>g. The post-development biodiversity value of the onsite habitat; h. Details of off-site biodiversity gains including details of the number of habitat, hedge, and watercourse units provided by each habitat provider(s) demonstrating that a minimum 10% net gains have been provided for habitat, hedge and watercourse units.</i> <i>i. Evidence of the purchase of habitat, hedge and watercourse units from off-site biodiversity gain providers or purchase of biodiversity credits.</i> BNG delivered onsite will be maintained for at least 30 years in line with the management plan to achieve target habitat conditions. Onsite BNG Habitat Management, Monitoring and Reporting Where Biodiversity Net Gain is being provided onsite, then prior to development commencing a Habitat Management and Monitoring Plan (HMMP), prepared (by a suitably qualified and experienced ecologist or other expert) in accordance with the approved interim biodiversity net gain assessment and using Natural England's HMMP template shall be submitted to and approved in writing by the Local	

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				Planning Authority/lead LPA (in consultation with the relevant LPAs) for. The HMMP shall include: (a) a non-technical summary; (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP; (c) the planned habitat enhancement and/or creation works to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan and a timetable for their implementation relative to the commencement of development; (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of habitat enhancements and/or creation works; and Within 28 days of the completion of the habitat enhancement and/or creation works as set out interim biodiversity net gain assessment, a completion report, evidencing the completed habitat enhancements, shall be submitted for approval in writing by the Local Planning Authority. Thereafter the habitats shall be managed, maintained and monitored in accordance with the HMMP to achieve the desired condition to deliver the predicted net gains. The habitat enhancements and/or creation works shall then be implemented in accordance with the approved details. A BNG Habitat Monitoring Report (using Natural England's HMMPT Monitoring Report Template) shall be submitted to the Local Planning Authority/lead authority (in consultation with the relevant LPAs) for approval in years 1, 3, 5, 10, 15, 20, 25 & 30.	
			Suffolk County Council [REP7-572]	SCC (Ecology) welcomes the introduction of new Requirement 11 in Schedule 3 to the draft DCO [REP6-030] but considers that the wording needs to be revised to ensure that there is a requirement for the relevant local authorities to approve in writing the submitted interim and final BNG assessments. As currently worded, the only requirement is for those assessments to be submitted (by specified timescales) but there is no mechanism for any review or audit or approval of their contents. Whilst SCC acknowledges that the mandatory BNG regime for NSIPs will not apply to the Application (because it was submitted before 2 November 2026), it is clear that the mandatory BNG regime does entail that a BNG requirement in a DCO will include the need for approval of any BNG plan (see para 9.6 of the Defra 'NSIP Projects - Biodiversity Net Gain Statement for Energy' (June 2026)). SCC considers that such an approval process plays an important role in ensuring that the BNG assessment has been calculated	The Applicant refers to the response provided in the first row to Babergh and Mid Suffolk District Councils in addition to a number of others above in relation to the matters raised in this response as they largely overlap. The Applicant disagrees with the Council in relation to the contention that weight can only be attributed to BNG if it is subject to approval by the Local Planning Authority. The Applicant considers that Requirement 11 provides sufficient certainty and enforceability in its current drafting.

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				correctly in accordance with the applicable Metric and that it has followed the mitigation hierarchy. SCC considers that if weight is to be given to the Applicant's proposals for BNG in this case, it is necessary for the DCO requirement securing those proposals to also include a need for written approval of both the interim and the final BNG assessments by the relevant planning authority. SCC therefore suggests that the words "and approved in writing by each relevant planning authority" be added to the end.	
			Suffolk Wildlife Trust [REP7-574]	We note that elsewhere in the draft DCO (requirement 8. Retention and removal of trees, woodland and hedgerows; and requirement 9. Reinstatement planting plan) wording is included to the effect that: a) No stage of the authorised development may commence/be brought into operational use until, for that stage, the relevant plan has been submitted to and approved by the relevant planning authority. b) the discharge of these requirements must be in accordance with the landscape and ecological management plan. While requirement 11. Biodiversity Net Gain requires the submission of biodiversity net gain assessments and a biodiversity offsetting scheme to the relevant planning authority at appropriate points in the development, it does not require the approval of said assessments and schemes by those planning authorities. Further, we note that the Biodiversity Net Gain Report (Final Issue A) and Outline Landscape and Ecological Management Plan (Final Issue F) both contain important information regarding the Applicant's approach to delivering a minimum 10% Biodiversity Net Gain. For instance: Biodiversity Net Gain Report (Final Issue A) (BNG Report) 6.1.2 Biodiversity is not physically bound by Local Planning Authority boundaries and therefore a holistic approach is proposed for any off-site habitat creation and/or enhancements, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). 6.1.3 Off-site locations chosen to deliver the necessary off-site biodiversity units will be chosen based on National Grid's carefully considered selection criteria. The selection criteria will take into account (amongst other criteria), the habitat type and condition required, the location in proximity to the Order Limits, the delivery partner's credibility and proven experience in delivery, cost per unit, timeframes and will also consider sites that provide added value in the form of additional societal and environmental benefits.	The Applicant refers to the response provided in the first row to Babergh and Mid Suffolk District Councils in addition to a number of others above in relation to the matters raised in this response as they largely overlap. Details of onsite BNG are secured through Requirement 4 and the final Landscape and Ecological Management Plan (LEMP) and therefore Requirement 4 appropriately references the Outline LEMP. Details of offsite BNG in the form of the Biodiversity Offsetting Scheme is secured through Requirement 11. The Applicant notes the ask to reference 7.1 Biodiversity Net Gain Report [REP7-320] within the requirement and therefore Requirement 11 has been updated at Deadline 8 in 3.1 Draft DCO [Revision H] to address this point. It is not however considered appropriate for the Outline LEMP to be referenced in relation to offsite BNG. In relation to the final comment, completion of the Biodiversity Offsetting Scheme means the point at which the biodiversity units identified in the Scheme have been purchased and secured by the Project.

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				Outline Landscape and Ecological Management Plan (Final Issue F) (OLEMP) 1.4.3 Within the RIIO-T3 Business Plan (2026-2031), National Grid has made commitments to the use of 10% BNG as a ‘catalyst to deliver wider environmental and societal benefits, working with strategic partners and communities to deliver large-scale actions supporting nature recovery strategies’ and to the use of ‘BNG is our chosen route to working with strategic partners to facilitate investment in nature that will deliver long-term sustainable benefits for biodiversity and communities’. We welcome the Applicant’s commitment in the BNG Report and OLEMP to delivering any off-site BNG measures required to achieve at least a 10% BNG for the scheme in locations where habitat creation and enhancement informed by the relevant LNRS will leave a biodiversity legacy in each of the three counties crossed by the project. This will be essential for achieving National Grid’s aim of using BNG as a ‘catalyst to deliver wider environmental and societal benefits’ and delivering ‘long-term sustainable benefits for biodiversity and communities’. However, the Biodiversity Net Gain requirement in Schedule 3 of the draft DCO does not refer to either the Biodiversity Net Gain Report or the (Outline) LEMP as containing information relevant to the discharge of this requirement. To bring requirement 11. Biodiversity Net Gain in line with requirements 8. And 9. We request the requirement be amended to include additional wording as follows: 11. Biodiversity Net Gain (1) Prior to the commencement of the authorised development, the interim biodiversity net gain assessment must be submitted to and approved by each relevant planning authority. (2) Within six months of the date on which the construction period ends for the authorised development, a final biodiversity net gain assessment must be submitted to and approved by each relevant planning authority. (3) In the event that the final biodiversity net gain assessment demonstrates that less than 10% biodiversity net gain has been achieved overall across the Order land following construction of the authorised development, a biodiversity offsetting scheme shall be submitted to and approved by each relevant planning authority. (4) The biodiversity offsetting scheme will be implemented by the undertaker acquiring biodiversity units from third party landowners who have entered into legal agreements with the relevant planning authority or responsible body (as	

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				applicable) to secure their land for the purposes of biodiversity net gain for a minimum period of 30 years and will identify proposed timings for the securing of offsite biodiversity enhancements. (5) The biodiversity offsetting scheme submitted under sub-paragraph must be in accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement and with the Biodiversity Net Gain Report (Final Issue A). (6) Within two months of completion of the biodiversity offsetting scheme, the undertaker must submit a report confirming completion to the relevant planning authority. Finally, we seek clarification regarding this last sub-paragraph (6) in the renumbered sub-paragraphs above) as to the specific meaning of ‘completion of the biodiversity offsetting scheme’ and when completion will be judged to have been achieved. Will this be when the final purchase of the required offsite Biodiversity Units has been completed?	
			Thurrock Council [REP7-575]	1.1 Thurrock Council welcomes the inclusion of Requirement 11 within the revised draft DCO and supports the Applicant's commitment to securing a minimum 10% Biodiversity Net Gain (BNG) across the Order land. 1.2 However, while the Council do not object to the Applicant's "interim/final assessment" approach, which appears pragmatic for a project of this scale, the Council is concerned that Requirement 11 does not provide any mechanism for review, approval, or agreement by the relevant planning authority. As currently drafted, compliance with the requirement is capable of being determined solely by the undertaker through submission of the relevant assessments. 1.3 The Council considers that a Biodiversity Net Gain Strategy should be submitted and approved prior to commencement of development. Such an approach is commonly used on major infrastructure projects and would provide greater certainty regarding the proposed measures, delivery mechanisms, monitoring arrangements, and management commitments that will be relied upon to achieve the stated biodiversity net gain outcomes. 1.4 A pre-commencement Biodiversity Net Gain Strategy would ensure that the relevant planning authority has an opportunity to review and approve the methodology proposed to achieve biodiversity net gain, rather than only reviewing the outcome through assessments submitted before and after construction. This would provide greater	The Applicant welcomes Thurrock Council's support of the inclusion of Requirement 11. The Applicant refers to the response provided in the first row to Babergh and Mid Suffolk District Councils in addition to a number of others above in relation to the matters raised in this response as they largely overlap. In response to point 1.4, the Applicant has committed to providing an Interim BNG Assessment at the pre-commencement stage and this is secured in Requirement 11 of 3.1 Draft DCO [Revision H]. In response to 1.5, the Applicant does not agree that the requirement should include additional wording. The requirement secures the delivery, the BNG assessments and Biodiversity Offsetting Schemes will demonstrate compliance. The metric already requires area habitat units, hedgerow units and watercourse units to be assessed separately, this is also reflected in 7.1 Biodiversity Net Gain Report [REP7-320]. In response to 1.6, the Applicant has committed in 7.4 Outline Landscape and Ecological Management Plan [REP7-342] to monitor and manage habitats included within onsite BNG in the Environmental Areas for 30-years. In response to 1.7 and 1.8, the Applicant does not consider that Requirement 11 needs to be updated. Requirement 11 as currently drafted provides a robust, transparent and enforceable mechanism to secure the Applicant's offsite BNG provision.

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				confidence that biodiversity net gain has been embedded within the design and delivery of the development from the outset. 1.5 The Council further considers that the requirement should specify how the 10% biodiversity net gain commitment will be achieved across the relevant biodiversity unit types. Whilst the Council acknowledges the Applicant's commitment to an overall 10% biodiversity net gain, the requirement should clearly demonstrate how gains will be secured in area-based habitat units, hedgerow units, and watercourse units, where relevant. This would provide clarity regarding the Applicant's intended approach and ensure that biodiversity gains are appropriately evidenced through the statutory biodiversity metric. 1.6 The Council also considers that the approved Biodiversity Net Gain Strategy should be secured throughout the operational life of the development and should be substantially in accordance with the Outline Landscape and Ecological Management Plan. This would provide certainty that the measures relied upon to secure biodiversity net gain are implemented, managed, and maintained in the long term, rather than simply proposed at the application stage. 1.7 The Council therefore recommends that Requirement 11 be amended to include the following provisions: <i>(1) No part of the authorised development may commence until a biodiversity net gain strategy for that part has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body.</i> <i>(2) The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 10% biodiversity net gain in area-based habitat units, a minimum of 10% biodiversity net gain in hedgerow units, and a minimum of 10% biodiversity net gain in watercourse units.</i> <i>(3) The biodiversity net gain strategy must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.</i> 1.8 The Council considers that the above amendments would provide a more robust, transparent, and enforceable mechanism for securing the Applicant's biodiversity net gain commitment and would ensure that the relevant planning authority has an appropriate role in reviewing and	

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				approving the strategy by which biodiversity net gain will be achieved and maintained.	
1.3	All local authorities	Validation checklists for discharge of requirement submissions/ requirement 15 of Schedule 3 (Employment and Skills Plan) The ExA draws the attention of all relevant local authorities to the applicant's response to questions 1c and 2b of [REP6-132]. Question 1c relates to the possible use of development validation checklists for the discharge of requirement submissions. The applicant previously responded on this matter in [REP4-303], acknowledging such check lists could be helpful, noted it would be appropriate for drafting to be proposed by the host authorities for its consideration. The applicant advises "No drafting has yet been proposed however the applicant will continue discussions on this matter with the host authorities as it progresses ways of working for the discharge of requirements." All local authorities are asked to signpost where such drafting has been previously provided in examinations submissions or to enter such drafting into the examination. Question 2b concerned the Employment and Skills Plan (ESP) and whether requirement 15 of schedule 3 of the draft DCO should be worded to require the document submitted pursuant to that requirement to be approved by the relevant discharging authorities. In the light of the applicant's comments on this matter, as set out in [REP6-132], the ExA seeks the views of all relevant local authorities on this	Babergh and Mid-Suffolk District Council [REP7-541] Suffolk County Council [REP7-572] [Endorses BMSDC response]	BMSDC suggest the following items as a minimum for an effective discharge of requirement validation checklist: Accurate description Accurate plans and, where relying on plans already approved, full citation of these plans with link to a living library of current approved plans (see BMSDC D5 submission REP6-135 regarding strategy for compliance monitoring, reporting and enforcement) Full context / trail of relevant approved / final management plans, drawings and DCO provisions that underpin / support. To include document reference, page numbers, paragraph numbers for as much detail as possible. Full context of response to draft DOR submission including how the final submission responds to comments / decision Details of any relevant licensing or other agreement BMSDC are aligned with SCC in terms of responses to this matter. BMSDC notes that no substantive amendments have been made to Requirement 15 since Deadline 5 [REP6-167]. Therefore, BMSDC's position remains unchanged. BMSDC continues to support the principle of securing a Final Employment and Skills Plan ("ESP") through Requirement 15. However, BMSDC remain 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-economic impacts and delivering meaningful skills, employment and supply chain outcomes. In particular, BMSDC 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"). BMSDC 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.	The Applicant notes BMSDC's suggested minimum content for a validation checklist and will look to incorporate these suggested items into the Draft Discharge of Requirements Strategy currently being progressed with the host authorities. The Applicant considers that the validation checklist would be a useful mechanism for identifying the information and documents that must accompany an application for the discharge of requirements, helping to ensure that submissions are complete at the point of validation. The purpose of the checklist should be to confirm that the required information has been submitted, with any matters relating to the adequacy or acceptability of that information addressed through the pre-application engagement process or, where necessary, through requests for further information set out in Schedule 4, paragraph 2(1) of 3.1 Draft DCO [Revision H]. The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained with NPS EN-1, specifically paragraph 5.13.12. Requirement 15 of 3.1 Draft DCO [Revision H] was therefore amended at Deadline 7 to require the approval of the Final Employment and Skills Plan by the relevant county planning authority and Thurrock Council. The Applicant maintains its position that because 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [REP7-296] did not identify significant effects upon local businesses that 8.13 Outline and Employment and Skills Plan [REP7-489] is not intended to deliver mitigation but to enhance the economic benefits of the project. The scope of the Outline ESP 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. As the Applicant stated in its response to 8.9.1 Applicant's Responses to First written Questions [REP3-074], the purpose of using 'substantially in accordance with' is to ensure certainty for the relevant planning authorities that the final plans are closely based on the principles that the relevant planning authorities are already familiar with from their consideration of the outline plans and that these agreed principles are not matters for debate at the discharge of Requirements stage. This terminology is consistent with that contained in Requirement 4, and is also consistent with the terminology

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		matter, especially in relation to the tests of necessity, relevance to planning, relevance to the development sought, enforceability, precision and reasonableness in all other respects.		For the reasons set out previously, including the continued absence of clear linkages between workforce and supply chain demand and proposed interventions, the lack of defined targets and monitoring arrangements, and the deferral of key elements to the post-consent stage, BMSDC 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.	of Requirement 4 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
			Essex County Council [REP7-553] Endorsed/replicated by: Basildon Borough Council [REP7-544], Brentwood Borough Council [REP7-546], Chelmsford City Council [REP7-548], Colchester City Council [REP7-549]	ECC would support the inclusion of validation checklists alongside a comprehensive approach to pre application engagement by the Applicant, to provide certainty over the scope of information to be provided in support of the discharge of requirements. ECC welcomes the early engagement proposed by the Applicant in the Draft Discharge of Requirements Strategy and Written Scheme of Stages document they have produced. This sets out a commitment to pre application engagement on the discharge of requirement As a minimum, it is considered that any checklist should cover: Accurate description Accurate plans and, where relying on plans already approved, full citation of these plans with link to / attached (living library of current approved plans also under discussion for compliance / enforcement) Full context / trail of relevant approved outline / final management plans, drawings and DCO provisions that underpin / support. To include doc ref, page numbers, para numbers for as much detail as possible. Full context of response to draft DOR submission and comments / decision Details of any relevant licensing or other agreement This approach is currently under discussion in connection with the discharge of requirements for Bramford to Twinstead. ECC sees no reason why a requirement for the final Employment and Skills Plan to be approved by the relevant local planning authorities would fail to satisfy the tests of necessity, relevance to planning, relevance to the development, enforceability, precision, and reasonableness. ECC's position on this matter reflects the importance of employment and skills outcomes to host communities across Essex and reinforces the need for proactive engagement with local authorities, which possess	The Applicant remains committed to engaging proactively with all host authorities throughout the discharge of requirements process. As part of this, the Applicant will continue to progress and seek agreement on appropriate 'ways of working' with the host authorities, including through the development of the Draft Discharge of Requirements Strategy. The Applicant notes ECC's suggested minimum content for a validation checklist and discussions on a similar checklist for the Bramford to Twinstead Project. The Applicant will look to incorporate these suggested items into the Draft Discharge of Requirements Strategy currently being progressed with the host authorities. The Applicant considers that the validation checklist would be a useful mechanism for identifying the information and documents that must accompany an application for the discharge of requirements, helping to ensure that submissions are complete at the point of validation. The purpose of the checklist should be to confirm that the required information has been submitted, with any matters relating to the adequacy or acceptability of that information addressed through the pre-application engagement process or, where necessary, through requests for further information set out in Schedule 4, paragraph 2(1) of 3.1 Draft DCO [Revision H]. The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained with NPS EN-1, specifically paragraph 5.13.12. Requirement 15 of 3.1 Draft DCO [Revision H] was therefore 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. 8.13 Outline Employment and Skills Plan [REP7-489] was also updated for Deadline 7. Amendments included a recognition at paragraph 7.3.2 of the advice and support that can be provided by ECC (and others) via stakeholder steering group including the importance of working collaboratively to develop and deliver initiatives that create

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				considerable experience and expertise in securing socio-economic benefits from major infrastructure projects. ECC is therefore of the opinion that local authorities are best placed to understand local labour market conditions, skills gaps, training provision, and the socio-economic needs of the communities affected by the development. ECC also have established relationships with employers, education providers, training organisations and community groups. This is considered even more important given the uncertainty surrounding the applicants proposal to fund Employment and Skills through the Community Benefit Fund and the arrangements for this especially in the absence of any link to the development itself. Relevant authority approval, in this case the County Council, would therefore provide assurance that the Plan aligns with local economic development priorities and responds appropriately to the specific opportunities and challenges arising from the project. ECC believes it would also ensure that the measures proposed are deliverable and capable of being monitored throughout the construction period to maximise local employment, skills and supply chain opportunities for Essex residents and businesses. As set out in its Local Impact Report [REP1-161] and other submissions, including those at Deadline 6, ECC considers that the project has the potential to give rise to significant, albeit temporary, impacts on businesses along the proposed route. This includes, in particular, wedding venues, educational facilities, and equestrian centres, as well as wider effects arising from increased traffic movements at key locations on the network., ECC therefore considers it important that appropriate mitigation measures are secured for affected businesses. ECC maintains that the scale and nature of the development, when considered alongside other concurrent infrastructure projects, could result in disruption to the local economy. Potential effects could include increased pressure on local services and highways, and the displacement of existing business activity. Paragraph 5.13.9 of NPS EN-1 states that the Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and by any other sources considered relevant and important to the decision. Furthermore, paragraph 5.13.12 states that the Secretary of State may wish to include a requirement for local authority approval of an Employment and Skills Plan. Such a plan should set out measures to promote local employment and skills	sustainable employment and skills outcomes for local communities and businesses. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [REP7-296] did not identify significant effects upon local businesses. As a consequence, 8.13 Outline and Employment and Skills Plan [REP7-489] is not intended to deliver mitigation but to enhance the economic benefits of the project.

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				development opportunities, including apprenticeships, engagement with schools and colleges, educational initiatives, and training programmes. ECC would contend that its position is consistent with this advice and is a reasonable response to ensure opportunities for employment and skills are maximised	
			South Norfolk District Council [REP7-571]	With regard to the Employment and Skills Plan, SNDC note the comments raised by the applicant with regard to the necessity of this and its assessment of how reasonable this would be to require an approval of the document. However, SNDC see no reason for having this requirement for just the submission of a document if this then not approved and secured.	The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained with NPS EN-1, specifically paragraph 5.13.12. Requirement 15 of 3.1 Draft DCO [Revision H] was therefore 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.
			Thurrock Council [REP7-575]	The Council is not in a position to propose drafting for a validation checklist at this stage. The Council would therefore welcome the opportunity to review and comment on any wording proposed by the Applicant and other local authorities. The Council's position on Requirement 15 of Schedule 3 of the draft DCO, relating to the Employment and Skills Plan (ESP), is set out in Appendix C of its Deadline 6 submission [REP6-170].	The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained with NPS EN-1, specifically paragraph 5.13.12. Requirement 15 of 3.1 Draft DCO [Revision H] was therefore 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.
			Braintree District Council [REP7-545]	The first part of this question relates to Local Validation Checklists and requests signposting to any submissions previously made by the Council on this matter. The Council can confirm that it made submissions regarding the proposed Local Validation Checklist at Deadline 6 (REP6-139). The Examining Authority's attention is drawn to Section 6.4 of the Council's Deadline 6 submission, which sets out the Council's position and suggested content. The list compiled in REP6-139 was discussed with other host authorities and was predominantly led by Babergh and Mid Suffolk District Councils, reflecting our ongoing involvement in the Bramford to Twinstead NSIP and experience of discharge of requirements processes on nationally significant infrastructure projects. At the time of writing, the Council is not aware of the Applicant's position regarding the suggested Local Validation Checklist. However, the Council continues to consider that the checklist set out in REP6-139 is clear, comprehensive and proportionate, and would assist in ensuring that discharge of requirement applications are submitted with sufficient information to enable their efficient determination.	The Applicant notes BDC's proposed validation checklist in their ISH3 and ISH4 post-hearing submission, including Action Points and Rule 17 letter [REP6-139] and considers that the items identified are broadly consistent with the approach being discussed with the other host authorities. The Applicant considers that the validation checklist would be a useful mechanism for identifying the information and documents that must accompany an application for the discharge of requirements, helping to ensure that submissions are complete at the point of validation. The purpose of the checklist should be to confirm that the required information has been submitted, with any matters relating to the adequacy or acceptability of that information addressed through the pre-application engagement process or, where necessary, through requests for further information set out in Schedule 4, paragraph 2(1) of 3.1 Draft DCO [Revision H] . The Applicant gave due consideration to comments received at Deadline 6, the Rule 17 letter and to policy advice contained with NPS EN-1, specifically paragraph 5.13.12. Requirement 15 of 3.1 Draft DCO [Revision H] was therefore amended at Deadline 7 to include for the prior approval of the Final Employment and Skills Plan by

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				The second part of the question relates to the Applicants response to Question 2b in REP6-132 relating to Requirement 15 (Employment and Skills plan). The Applicant's position is that the Employment and Skills Plan (ESP) is a benefit-led document intended to maximise positive socio-economic outcomes rather than mitigate any identified adverse effects of the Project. As the ESP is not relied upon within the Environmental Statement to make the development acceptable in planning terms, the Applicant considers that it is neither necessary nor proportionate for it to be subject to formal approval by the relevant authorities. Instead, the Applicant considers that submission of the final ESP for information, coupled with a requirement for the Project to be delivered in general accordance with that Plan, provides an appropriate mechanism that ensures transparency and engagement without imposing regulatory controls that are ordinarily reserved for mitigation measures. In REP6-139, Section 6.2, the Council considered that any ESP secured through the DCO should be subject to approval by the relevant County Council or Unitary Authority, but ultimately deferred to the expertise of Essex County Council who have been leading on these matters. Despite the comments from the Applicant, the Council maintains its view that any Employment and Skills Plan secured through the DCO should be submitted for approval by the relevant County Council or Unitary Authority, or alternatively be prepared in consultation and agreement with those authorities. Whilst the Council acknowledges the Applicant's position that the ESP is intended to secure positive socio-economic benefits rather than mitigate identified adverse effects, the Council considers that some form of approval or collaboration mechanism is necessary to ensure that the measures proposed appropriately reflect local employment, skills and training priorities and can be effectively monitored throughout delivery of the Project. Without such a mechanism, the role of the relevant authority would be limited to receipt of information, with little opportunity to influence or verify delivery of the intended benefits. Overall, whilst the Council continues to defer to Essex County Council as the lead authority on employment and skills matters, it remains concerned that the absence of an approval or agreed collaboration mechanism would significantly reduce the effectiveness and accountability of Requirement 15.	the relevant county planning authority and Thurrock Council.
			Norfolk County Council [REP7-564]	In relation to the drafting of a requirement validation checklist, NCC defers to the authorities which have been pursuing that approach.	The Applicant notes the Council's comments regarding the relevant tests, including necessity, and the role of employment, skills and supply chain benefits in the

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				In relation to the employment and skills plan (ESP), NCC considers that Requirement 15 can satisfy the tests, including necessity. Paragraph 5.13.12 of EN-1 expressly envisages the inclusion of a requirement providing for local authority approval of an Employment and Skills Plan. This demonstrates that Government policy recognises employment and skills outcomes as matters capable of being secured through the DCO notwithstanding that they may not be relied upon to mitigate a significant adverse effect. In the present case, the applicant has advanced employment, skills and supply chain benefits as socio-economic benefits arising from the proposed development. To the extent that those benefits form part of the overall planning balance and are capable of attracting weight in decision making, it is necessary that an appropriate mechanism exists to secure their delivery. Requirement 15 performs that function.	planning balance. The Applicant acknowledges that these outcomes represent positive socio-economic benefits associated with the Project, but maintains that 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [REP7-296] did not identify significant effects upon local businesses. Consequently, 8.13 Outline and Employment and Skills Plan [REP7-489] is not intended to deliver mitigation but to enhance the economic benefits of the Project. In relation to the need for an appropriate mechanism to secure its delivery, the Applicant notes that Requirement 15 of 3.1 Draft DCO [Revision H] was 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.
1.4	All local authorities who replied to second written question (ExQ2) [PD-023] DCO 2.S3	Outline Code of Construction Practice Appendix E (Community Engagement and Public Information) and Appendix F (Outline Noise and Vibration Management) The applicant responded to ExQ2 questions DCO 2.S3 and DCO 2.S6 in [REP6-115]. Revisions were made to the 'Outline Code of Construction Practise Appendix E - Community Engagement and Public Information' [REP6-078] and the 'Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management' [REP6-080]. The ExA seeks a response from all local authorities who responded to ExQ2 [PD-023] DCO 2.S3 and DCO 2.S6, regarding the adequacy of the revisions submitted, bearing in mind their previous responses to ExQ2 submitted at deadline 5.	Babergh and Mid-Suffolk District Council [REP7-541]	<i>Appendix E - Community Engagement and Public Information</i> BMSDC acknowledge that the revisions made to Appendix E substantially address a number of the concerns previously raised , including provision of a complaints register, dedicated community relations arrangements, complaint investigation procedures, escalation routes and review of recurring issues. However, the revised drafting does not include all of the measures previously requested, particularly in relation to approval of the subsequent detailed complaints procedure, defined acknowledgement timescales, provision of complaints data to the relevant planning authority and identification of a named responsible officer. Whilst the revisions represent a significant improvement on the previous drafting, further amendments (as outlined above) are considered necessary to ensure confidence, transparency and oversight during the construction phase. <i>Appendix F - Outline Noise and Vibration Management Plan</i> BMSDC acknowledge that the Applicant has made a number of substantive amendments to both the Outline NVMP (REP6-080) and the Outline CoCP (REP6-072) in response to concerns raised by local authorities during the Examination. In particular, the revised Outline NVMP now provides for monitoring proposals, monitoring locations, thresholds, trigger levels, reporting arrangements and exceedance actions to be developed and agreed with the relevant local planning authority through the detailed NVMP. The revised document also provides for complaint-led monitoring, investigation of exceedances, implementation of remedial measures and reporting of	The Applicant notes the Council's comments regarding the management of complaints, the availability of complaint logs and the proposed response timescales 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 provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, including local authorities, where appropriate. While Appendix E does not prescribe the routine sharing of complaint logs with host authorities 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.

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				monitoring outcomes to the relevant local planning authority. BMSDC consider these amendments appropriate to largely address the concerns previously raised in relation to monitoring and enforcement mechanisms for noise and vibration impacts. Furthermore, through amendments to commitment NV05 and the operation of Requirement 4, the Applicant has confirmed that the detailed NVMP will be submitted to the relevant local planning authority for approval prior to commencement of the relevant stage of development. This is a significant improvement to the control framework, as it provides the relevant authority with direct oversight of the detailed noise and vibration mitigation, monitoring and management measures that will be implemented during construction. Whilst acknowledging the progress on the matter of noise and vibration compliance, BMSDC wish to take this opportunity to reiterate their request, set out in REP6-135 for a comprehensive strategy, to be in the form of an appendix to the CoCP, for ongoing and regular proactive compliance monitoring and reporting, plus enforcement and regularisation procedures for all reported complaints and identified non-compliance. This is necessary for all matters in the delivery of the development, not solely limited to noise and vibration management.	The Applicant notes the response regarding the updates to 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP7-332].
			Essex County Council [REP7-553], Endorsed/replicated by Basildon Borough Council [REP7-544], Braintree District Council, Chelmsford City Council [REP7-548], Colchester City Council [REP7-549]	<u>Appendix E - Community Engagement and Public Information</u> The Council acknowledges that the revisions made to Appendix E substantially address a number of the concerns previously raised, including provision of a complaints register, dedicated community relations arrangements, complaint investigation procedures, escalation routes and review of recurring issues. However, the Council notes that the revised drafting does not include all of the measures previously requested, particularly in relation to the approval of the subsequent detailed complaints procedure, defined acknowledgement timescales, provision of complaints data to the relevant planning authority and identification of a named responsible officer. Whilst the revisions represent a significant improvement on the previous drafting, ECC considers that further amendments (as outlined above) could strengthen transparency and oversight during the construction phase. <u>Appendix F - Outline Noise and Vibration Management Plan</u> ECC responded at Deadline 5 [REP5-232] to ExQ DCO 2.S6. In summary, the Council considered that the CoCP	The Applicant notes the Council's comments regarding the management of complaints, the availability of complaint logs and the proposed response timescales 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 provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, including local authorities, where appropriate. While Appendix E does not prescribe the routine sharing of complaint logs with host authorities 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

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				should include a clear noise complaints and monitoring procedure requiring notification of sensitive receptors, investigation and noise monitoring following complaints, application of BS5228 noise thresholds, and implementation of defined trigger levels requiring mitigation measures or cessation of works where specified exceedances occur. The Applicant acknowledged the Council's suggested noise monitoring and trigger level approach but considers that the detailed monitoring arrangements, thresholds and associated response measures should be agreed with the relevant local planning authorities through the detailed Noise and Vibration Management Plan secured under Requirement 4 of the draft DCO, rather than being prescribed within the Outline CoCP itself. The Council continues to hold some residual concerns regarding whether the Environmental Statement has fully assessed the reasonable worst-case noise and vibration effects arising from the Project. However, the Council acknowledges that the Applicant has made a number of substantive amendments to both the Outline NVMP (REP6-080) and the Outline CoCP (REP6-072) in response to concerns raised by local authorities during the Examination. In particular, the revised Outline NVMP now provides for monitoring proposals, monitoring locations, thresholds, trigger levels, reporting arrangements and exceedance actions to be developed and agreed with the relevant local planning authority through the detailed NVMP. The revised document also provides for complaint-led monitoring, investigation of exceedances, implementation of remedial measures and reporting of monitoring outcomes to the relevant local planning authority. The Council considers that these amendments substantially address the concerns previously raised in relation to monitoring and enforcement mechanisms Furthermore, through amendments to commitment NV05 and the operation of Requirement 4, the Applicant has confirmed that the detailed NVMP will be submitted to the relevant local planning authority for approval prior to commencement of the relevant stage of development. ECC considers this to be a significant improvement to the control framework, as it provides the relevant authority with direct oversight of the detailed noise and vibration mitigation, monitoring and management measures that will be implemented during construction. This addresses one of the Council's longstanding concerns that sufficient control and approval mechanisms were not previously secured through the DCO documentation.	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 notes the response regarding the updates to 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP7-332].

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				On balance, whilst the Council maintains its position that some uncertainty remains regarding the assessment of worst-case effects, it considers that the revisions made to the Outline NVMP and the associated approval mechanism secured through Requirement 4 have substantially addressed the concerns previously raised in relation to the management, monitoring and control of construction noise and vibration impacts. Whilst acknowledging the progress on the matter of noise and vibration compliance, ECC wish to take this opportunity to reiterate their request, set out in REP6-139 for a comprehensive strategy, to be in the form of an appendix to the CoCP, for ongoing and regular proactive compliance monitoring and reporting, plus enforcement and regularisation procedures for all reported complaints and identified non-compliance. This is necessary for all matters in the delivery of the development, not solely limited to noise and vibration management.	
			South Norfolk District Council [REP7-571]	The Outline Code of Construction Practise Appendix E - Community Engagement and Public Information is mostly acceptable but does not mention making the complaints log available to the Local Authority, the communication process when the Local Authority will be contacted by the community relations team regarding complaints/issues. The response time of 10 days is not considered to be acceptable. Given the potential construction speed of the pylons, it is likely that the works which had caused the complaints would have finished within this time. It is considered that 48 hours is a more appropriate timeframe (72hrs if the complaint is received on Saturday). The Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management (4.6.1) states that noise and vibration monitoring will be undertaken but does not state that he locations/duration etc will be agreed with the LA. This needs to be amended to state that the locations will be agreed. Paragraph 4.6.3 states that some locations may not be agreed to monitor noise/vibration as soon as possible. While this is acceptable for unusual circumstances, the LA should be notified as soon a possible of the installation, location and reason for the monitoring.	The Applicant notes the Council's comments regarding the management of complaints, the availability of complaint logs and the proposed response timescales 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 provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, including local authorities, where appropriate. While Appendix E does not prescribe the routine sharing of complaint logs with host authorities 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 also notes the request to reduce the proposed response time from 10 working days to 48 hours (or 72 hours where complaints are received at weekends). However, the Applicant considers that the timescales currently set out in Appendix E strike an appropriate

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					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. 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 notes the response regarding the updates to 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP7-332]. Paragraph 4.6.1 states that monitoring proposals will be submitted to the relevant local planning authority which requires agreement in accordance with commitment NV05 of 7.2 Outline Code of Construction Practice [Revision H].
			Suffolk County Council [REP7-572]	SCC (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 the Council's comments regarding the management of complaints, the availability of complaint logs and the proposed response timescales 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 provides sufficient and proportionate mechanisms for recording, managing and responding to complaints, while enabling engagement with relevant stakeholders, including local authorities, where appropriate. While Appendix E does not prescribe the routine sharing of complaint logs with host authorities 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

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					and that no amendment is required in response to this representation.
			Thurrock Council [REP7-575]	3.1 Thurrock Council has the revised Outline Code of Construction Practice Appendix E - Community Engagement and Public Information and Appendix F - Outline Noise and Vibration Management. 3.2 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. 3.3 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. 3.4 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. 3.5 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. 3.6 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. 3.7 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. The Council therefore considers the matters raised previously to be resolved.	7.2 Outline Code of Construction Practice [Revision H] 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. While 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision E] does not prescribe the routine sharing of complaint logs with host authorities 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 notes the response regarding the updates to 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP7-332].

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1.5	Applicant Suffolk Wildlife Trust Suffolk County Council Essex County Council	Outline Landscape and Ecological Management Plan and ecological working group In its response to ExQ2 DCO 2.S5, Suffolk Wildlife Trust advised it was happy to support the wording, including in relation to the wording of a requirement, for an ecological working group, as proposed and submitted by Suffolk CC [REP5-270]. The applicant has amended the outline Landscape and Ecological Management Plan (LEMP) [REP6-084] to confirm the remit of the ecological working group broadly aligns with the text suggested by Suffolk Wildlife Trust [REP1 278]. The establishment of such a working group is supported by Essex CC ([REP5-241], [REP5-243]), who also request the expansion of the scope of the group to include landscape matters, which is reflected in the outline LEMP [REP6-084]. To the applicant: a) Explain why you have chosen to amend the text to broadly align with the text suggested by Suffolk Wildlife Trust in its deadline 1 submission and not amended the outline LEMP to reflect the more up to date position where Suffolk Wildlife Trust had agreed to support the wording submitted and proposed by Suffolk CC ([REP5-270] Appendix A (entitled LEWG Requirement)) concerning an ecological working group (which may include landscape considerations). b) Explain why you consider in your response to Essex CC [REP6-114] the remit of such a working group should be constrained to ecological matters only and justify why the draft DCO	Essex County Council [REP7-553] Endorsed/replicated by: Chelmsford City Council [REP7-548]	ECC welcomes the amendments made to the revised Outline Landscape and Ecological Management Plan (OLEMP) to establish an Ecology and Landscape Working Group and broaden its remit beyond purely ecological matters. ECC is broadly satisfied that the proposed wording provides an appropriate mechanism for engagement between the Applicant, local authorities and environmental stakeholders during implementation of the Project. ECC supports the inclusion of landscape matters within the remit of the Working Group and does not consider that its role should be limited solely to ecological matters. Many of the Project's outcomes, including Biodiversity Net Gain (BNG), habitat creation, Environmental Areas, Green Infrastructure (GI), habitat connectivity and Local Nature Recovery Strategy (LNRS) objectives, are closely interrelated. This applies not only to onsite and offsite BNG delivery, but also to the wider mitigation, compensation and enhancement measures proposed across the Project. ECC therefore supports their integrated consideration through a single forum. ECC considers the Working Group has the potential to provide an effective resource to support the delivery of the project and aid through discussion, the resolution of ecological and landscape matters should they arise during implementation. Examples of matters that ECC considers should fall within the scope of the Working Group include landscape and habitat establishment as well as advising on the implementation of the Offsite Planting Delivery Scheme, long-term management of Environmental Areas, habitat connectivity, integration of landscape mitigation and BNG delivery, alignment with LNRS priorities, and adaptive management where intended environmental outcomes are not being achieved. This matter is covered within ECC’s SoCG being submitted at Deadline 7.	The Applicant welcomes the Councils’ response on this matter.
		Suffolk County Council [REP7-572] c) While the wording in the latest oLEMP [REP6-084] is broadly acceptable, the wording provided by SCC 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. d) SCC (Landscape) supports Essex CC’s request to broaden the scope of the working group to include landscape matters. This should include: Monitoring the effectiveness of screen planting around substations and CSE compounds and, if required,		The revised 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 and now includes landscape matters. The wording in 11.2 of the 7.4 Outline Landscape and Ecological Management Plan [REP7-342] does not list each specific item to be covered by the group, as this was deemed to be too	

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		requirement has not been included with reference to both landscape and ecology matters. To Suffolk Wildlife Trust, Suffolk CC and Essex CC: c) Advise whether you are satisfied in regard to the applicant's wording, as set out in the applicant's outline LEMP [REP6-084], which it advises broadly aligns with Suffolk Wildlife Trust's suggested text, as contained in its deadline 1 submission [REP1-278] at paragraph 2.3. d) Provide examples of the types of landscape matters that you consider should fall within the remit of this working group.		amending management measures to achieve the landscape objectives set out in the LEMP. Monitoring the effectiveness of off-site tree planting and, if required, amending management measures to achieve objectives set out in the Offsite Planting Delivery Scheme (OPDS) [REP6-128]. Informing the further development of the indicative landscape masterplans, supporting local authorities in monitoring and reviewing their success, and, if required, amending management measures to achieve their objectives for wider landscape enhancement. Monitoring and reviewing success of veteranisation measure on trees and, if required, amending management measures to achieve objectives set out in the LEMP.	restrictive, but rather includes a broad commitment to discussions on all relevant ecology and landscape matters. As stated in the 7.4 Outline Landscape and Ecological Management Plan [REP7-342] further details will be included within the Final Landscape and Ecological Management Plan, '<i>... including agreement of its remit and terms of reference, membership and attendance arrangements, meeting frequency, and the format of progress reporting and information sharing these further details will be included within the Final LEMP.</i>' The Applicant maintains its position that the amended wording on the Ecology and Landscape Working Group in the 7.4 Outline Landscape and Ecological Management Plan [REP7-342] is appropriate and provides sufficient flexibility to allow for a range of discussions from for all parties during the construction period.
			Suffolk Wildlife Trust [REP7-574]	Suffolk Wildlife Trust continue to support the wording of a requirement for a Landscape and Ecology Working Group (LEWG) proposed by Suffolk CC [REP5-270]. We note that the draft DCO does not include a requirement in Schedule 3 for the establishment of the LEWG and this is instead left to the LEMP and requirement 4. Construction Management Plans to ensure the scheme is delivered in accordance with the LEMP. We are uncertain whether a requirement needs to be added to Schedule 3 of the DCO to secure the establishment of the LEWG in accordance with the wording proposed by SCC, but if this is necessary, the draft DCO needs to be amended to include such a requirement.	The Applicant's facilitation and remit of the Landscape and Ecology Working Group is clearly set out within the 7.4 Outline Landscape and Ecological Management Plan [REP7-342], which is already secured via Requirement 4 of the 3.1 Draft DCO [Revision H]. The Applicant does not consider it necessary to include a separate Requirement within the DCO for the Ecology and Landscape Working Group.
1.7	All relevant local highway authorities and lead local flood authorities (including the Water Management Alliance), Affinity Water Ltd, Anglian	Protective Provisions (2) A number of preferred PPs having been submitted into the examination. If you have not submitted a preferred PP into the examination, the listed interested parties are asked to do so. If you have already submitted your preferred PP into the examination, please signpost the reference where it can be located in the Examination Library.	Suffolk County Council [REP7-572] Babergh and Mid-Suffolk District Council [REP7-541] [Defer to SCC]	Concerning the Local Highway Authorities preferred Protective Provisions, SCC would (subject to minor drafting changes) accept the proposed protective provisions for highway authorities. As an alternative, SCC may accept a repetition of the Bramford to Twinstead Framework Highway Agreement. However, the authority notes that the PPs do not give full coverage to all matters, for example cost recovery for highway officers monitoring management plans and associated reports or reviews of highway structures with assessment of AILs (Article 51 protects the applicant from double recovery). Appendix A of this submission includes the Local Highway Authorities preferred Protective Provisions. These were shared with the Applicant on 3 July 2026 (with one minor amendment made since, concerning the definition of "commuted sums"), the Councils have yet to receive a reply.	The Applicant shared an updated set of protective provisions with the local highways authorities in response to comments received from Essex County Council, Suffolk County Council and Norfolk County Council on 3 August. The Applicant provides a detailed review of the drafting differences between the two sets of protective provisions in 8.7 Statutory Undertaker Tracker [Revision G] .

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	Water Services Ltd, Cadent Gas Ltd, Equinor New Energy Ltd, National Gas Transmission, National Highways and National Highways (Lower Thames Crossing), Network Rail Infrastructure Ltd, Northumbrian Water Ltd, Scottish Power Renewables UK Ltd (including East Anglia 1 and East Anglia 3 Ltd) and TC East Anglia 1 OFTO Ltd			Regarding the Lead Local Flood Authorities preferred Protective Provisions, SCC's position was previously explained in its Post Hearing Submission for ISH3/4 [REP6 - 116] . As it was explained within the post-hearing note, on 3 July 2026 the Applicant shared its updated PPs with the authorities. Upon review, SCC can confirm that the Applicant has recognised the Council's objection to the reduced timeframe for determination and remedied this within the PPs to SCC's satisfaction (increased to 40 business days, the same as the equivalent calendar days as contained within section 23 of the Land Drainage Act 1991). Therefore, SCC has withdrawn its objection to the disapplication of section 23 of the Land Drainage Act 1991 and agrees to the Protective Provisions as drafted by the Applicant.	
			Affinity Water [REP7-537]	The Rule 17 letter requests that Affinity Water's preferred protective provisions be submitted to the Examination. Please find enclosed Affinity Water's preferred form of protective provisions. These protective provisions have also been provided to the Applicant and remain the subject of ongoing discussions between the parties. Affinity Water remains committed to engaging constructively with the Applicant and is hopeful that agreement can be reached in respect of the protective provisions before the close of the Examination, provided that the applicant engages with Affinity Water in respect of the draft shared on 23 June 2026. We hope to be able to provide a positive update at Deadline 8.	The Applicant received comments and proposed amendments on protective provisions for Affinity Water's benefit on 2 August 2026 and is currently reviewing these. It is noted that, while some provisions remain outstanding, there is further agreement on other substantive provisions including measures to facilitate Affinity Water's access to its apparatus in stopped up streets, and for Affinity Water's supervision and inspection of specified works. The Applicant intends to continue discussions with Affinity Water after the close of the Examination to further narrow the differences and remains hopeful that full agreement will be reached between the parties.
			Essex County Council [REP7-553]	ECC as Lead Local Flood Authority considers that it could withdraw its objection to the disapplication of section 23. Commentary has been provided on the latest draft of the Protective Provisions to the Applicant. ECC is liaising with SCC and NCC on the drafting of Protective Provisions for the Highway Authority alongside discussions on finalising the Framework Highways Agreement. ECC understand that SCC have submitted the draft Protective Provisions to National Grid's Solicitors which take account of comments from ECC, NCC and SCC.	The Applicant shared an updated set of protective provisions with the local highways authorities in response to comments received from Essex County Council, Suffolk County Council and Norfolk County Council on 3 August. The Applicant provides a detailed review of the drafting differences between the two sets of protective provisions in 8.7 Statutory Undertaker Tracker [Revision G] .
			Anglian Water [REP7-539]	Anglian Water Services Limited (herein referred to as Anglian Water) welcomes the opportunity to respond to the Examining Authority's Question 1.7 in relation to the Protective Provisions for Anglian Water in the draft Development Consent Order for the Norwich to Tilbury Project (the Project). Protective Provisions for the benefit of Anglian Water were previously formally agreed between Anglian Water and National Grid (the Applicant) and were included within the	The Applicant has engaged with Anglian Water since the Deadline 7 submission and understands that they have now formally submitted a withdrawal of their objection to the ExA, expected to be published at Deadline 8. The Applicant welcomes this and has no further comment.

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				draft Development Consent Order submitted at Deadline 6, at Schedule 16, Part 14 [REP6-030]. This reflected the position between the parties at that stage of the Examination. Since that time, further discussions have taken place between the parties in respect of the matters under discussion, identified in the Statement of Common Ground (SoCG) submitted at Deadline 4 [REP4-102]. Those discussions have resulted in agreement being withdrawn for the Protective Provisions previously included in Schedule 16, Part 14, as further changes were put forward by Anglian Water for inclusion and required appropriate consideration in the final position between the parties. Anglian Water and the Applicant have continued to work constructively to ensure that the agreed position is accurately recorded. The updated position on Protective Provisions, including the withdrawal of the previously agreed form and the basis for any further proposed provisions, is set out in the signed final SoCG for submission at Deadline 7. Following the signing of the final SoCG, subsequent discussion between Anglian Water and the Applicant has resulted in a further amendment to the Protective Provisions being proposed by the Applicant. Anglian Water has since confirmed that the proposed amendment is agreed, and highlighted corrections to references within the Protective Provisions. Anglian Water is satisfied that the proposed amendment to the Protective Provisions addresses the concerns raised through discussions on specific outstanding matters (references 8.4 and 8.5) identified in the final SoCG. This would ensure that details of any impacts to Anglian Water's apparatus and proposed measures to mitigate those impacts would be submitted to Anglian Water with the plan of works to be carried out. The Applicant has proposed that the additional amendments to the Protective Provisions, put forward by Anglian Water, as a result of discussions on matters in the SoCG regarding the Project's interactions with our proposed investment schemes for Asset Management Period 2025-2030 (AMP8), should be addressed through a separate bilateral agreement between Anglian Water and the Applicant. The proposed agreement is currently being reviewed by Anglian Water. Anglian Water therefore considers that this most recent amendment to the Protective Provisions provides an appropriate basis for protecting its interests within the draft Development Consent Order, subject to ongoing review of	

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				the separate bilateral agreement referred to above. Once the amended Protective Provisions have been submitted into the Examination to update the draft Development Consent Order, Anglian Water should be in a position to formally withdraw its objection raised in the Relevant Representation [RR-0216] . Anglian Water will continue to engage constructively with the Applicant as required and respectfully requests the Examining Authority to take this updated position into account.	
			East Anglia One OFTO Limited [REP7-552]	The OFTO received a draft set of protective provisions from the Applicant on 17 July 2026. Given the timing of receipt of this draft, there has been insufficient time for the OFTO to fully consider the terms of these protective provisions ahead of today's deadline. Whilst we accept that appropriately drafted protective provisions could provide comfort on some of the OFTO's concerns, at present we do not consider there to be sufficient protections, and we propose to prepare a more detailed mark-up of the protective provisions to ensure the protective provisions are appropriate. We intend to discuss this with the Applicant with a view to submitting either an agreed set of protective provisions or where this is not possible the OFTO's preferred set of protective provisions to the Examining Authority prior to Deadline 8.	The Applicant has engaged with ScottishPower Renewables (UK) Limited (SPRUKL) in respect of the Project's interactions with the East Anglia One substation since 2024. The OFTO has more recently engaged with the Applicant on matters concerning its interest in the EA1 substation however the OFTO had not provided at the point of Deadline 7 any draft protective provisions in its own interest and so the Applicant provided prior to Deadline 7 draft protective provisions based on those offered to East Anglia One Limited in the absence of any draft provisions from the OFTO. These protective provisions are included in 3.1 Draft Development Consent Order (Revision G) submitted at Deadline 7. The Applicant considers that these provisions provide the OFTO with suitable protections in respect of its interests such that it will be able to continue its undertaking in relation to the EA1 project alongside the Project. The Applicant is further submitting an amended set of protective provisions to 3.1 Draft Development Consent Order (Revision G) in order to include a provision acknowledging the extent of Class 8 land in respect of land plots falling within the EA1 substation, in response to the Deadline 7 submissions made by SPRUKL. The Applicant is committed to continue working with the OFTO to review and consider the amended set of protective provisions issued by the OFTO to the Applicant on 30 July 2026 and has agreed with the OFTO to continue negotiations on the protective provisions and the heads of terms for the legal interface agreement.
			National Highways [REP7-561]	NH's preferred Protective Provisions (PP's) are appended to its Deadline 6 response at Appendix 1 [REP6-155] . However, it is noted that the Applicant has now accepted some (but not all) of the points raised by NH in the latest draft DCO [REP6-031] . Accordingly, a revised version of NH's preferred PPs with the outstanding issues/changes required by NH shown in tracked changes is appended at Appendix 1 of this submission.	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 c) Paragraph 9(3) as requested by National Highways has been included to cover contractual costs incurred by National Highways.

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				Appendix 1 Amendments to Protective Provisions in the dDCO <i>The IP provides a summary of the outstanding matters and changes that National Highways are seeking.</i>	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. 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.
			Sheringham Shoal and Dudgeon Extensions Projco Limited [REP7-570]	We are writing on behalf of our client Sheringham Shoal and Dudgeon Extensions Projco Limited (Registered Interested Party Reference [redacted]). We write in response to the Examining Authority's Rule 17 request dated 14 July 2026. In particular, this response relates to Question 1.7 in Annex A of that Rule 17 which seeks confirmation from statutory undertakers on their preferred protective provisions. At Deadline 6 Sheringham Shoal and Dudgeon Extensions Projco Limited (SSDEPL) submitted information to the Examining Authority (REP6-163). This included at pages 4 onwards a set of SSDEPL's preferred protective provisions for the Examining Authority to consider. Since Deadline 6, SSDEPL and the Applicant have been in further discussion regarding protective provisions. The Applicant has provided an updated set of protective provisions for SSDEPL to consider and SSDEPL have agreed to some of the Applicant's drafting changes so the number of 'not agreed' points has reduced from that Deadline 6 submission.	The Applicant agrees that there have been ongoing discussions in relation to potential interfaces with SSDEPL's project and the protective provisions in particular. A revised draft of those protective provisions was included in the draft order at Deadline 7 and a further revised version is included in 3.1 Draft DCO [Revision H]. Both sets of amendments were intended to bring the parties closer to an agreed set of protective provisions and the Applicant welcomes SSDEPL's comment that the number of 'not agreed' points has reduced. A full explanation of the points which the Applicant understands remain outstanding can be found at table 2.2 in the Appendix to 8.7 Statutory Undertaker Tracker [Revision G]. In relation to points specifically identified here, the Applicant would add the following points. Row 1 of table 2.2 in 8.7 Statutory Undertaker Tracker [Revision G] sets out the Applicant's full position in relation to the protection of SSDEPL's land interests. The wording in the protective provisions, as amended at Deadline 8, provides that the Applicant must not acquire, extinguish or

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				However, at this stage, the parties are not yet agreed on a final set of protective provisions to be included within the draft DCO. The key areas of disagreement which remain are that suitable protection on the following matters have not yet been set out to SSDEPL's satisfaction: • Protection of the rights SSDEPL currently holds in land from being extinguished; • Ability for SSDEPL to acquire the land rights it needs to deliver its project without being prevented from doing so; and • Protection for SSDEPL from displacement when SSDEPL is in occupation or temporary possession of land. SSDEPL will continue to work with the Applicant with a view to reaching an agreed position. A meeting to further discuss the position has been arranged for 22 July 2026 and SSDEPL hopes to continue making positive progress with the Applicant in advance of Deadline 8. If an agreed position cannot be reached, a preferred set of provisions for our client, noting the remaining areas of disagreement with the Applicant, will be submitted at Deadline 8	suspend any rights or apparatus that SSDEPL has in respect of any apparatus, cables or access routes without the consent of SSDEPL, which must not be unreasonably withheld or delayed but which may be made subject to reasonable conditions. Following further discussions with SSDEPL has added specific references to SSDEPL's cable locations and access routes. It understands that these are key concerns of SSDEPL and so this should provide additional reassurance that rights in relation to those will not be acquired, extinguished or suspended, in addition to apparatus once constructed. Based on its current understanding, the Applicant has no intention to acquire, extinguish or suspend any rights which SSDEPL does acquire. Currently, the SSDE project has no constructed apparatus and the only land rights it holds are under an option agreement. The Applicant has not seen that option agreement and does not have the detail of other option agreements it understands to be under negotiation by SSDEPL. For these reasons, it is unable to include a general restriction on its exercise of compulsory powers which would prevent it from overriding or interfering with any land rights or apparatus. It simply does not have the level of certainty which would be required to understand the nature of that commitment and requires the land rights sought in order to be able to deliver its Project without SSDEPL being able to prevent that delivery. Similarly, given the current level of uncertainty, the Applicant is also unable to accept the restriction on its temporary possession powers which it understands SSDEPL to be seeking. Given the critical nature of the NTT Project and its programme, the Applicant cannot be in a position where SSDEPL could have control over its exercise of land powers (both temporary and permanent) in the crucial area around the Norwich Main substation. The Applicant acknowledges that there are some complexities around the exercise of temporary possession powers in the overlap area but considers this is a matter to be worked out commercially between the parties as part of a future agreement relating to notification of landowners, restoration obligations, payment of compensation etc. It is negotiating a bilateral side agreement with SSDEPL which would cover off these issues in a more appropriate manner than protective provisions and which enables the Applicant to retain its compulsory acquisition and temporary possession powers as a fallback position to ensure that the Applicant is able to deliver the Project and to do so in a timely manner.

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					The Applicant will continue to engage with SSDEPL with the aim of completing an appropriate side agreement offering further detail in relation to interfaces between the two projects. For the reasons set out in 8.29.13 Application under Section 127 Planning Act 2008 – Sheringham Shoal and Dudgeon Extensions Projco Limited (Revision B), there is sufficient protection for SSDEPL through the protective provisions in advance of that side agreement being completed.
			Thurrock Council [REP7-575]	4.1 The Council is currently in discussions with the Applicant to agree a draft Framework Highways Agreement. This is to be submitted by the Applicant. 4.2 Thurrock Council is aligned with Norfolk County Council and Essex County Council on flood risk Protective Provisions. The current draft iteration will be submitted by the Applicant.	The Applicant is committed to continuing negotiations with Thurrock Council to agree a Framework Highways Agreement following the close of Examination. In any event, the Applicant considers that the protective provisions in favour of the local highway authorities offer sufficient protection to enable safe operation of the public highway.
			Norfolk County Council [REP7-564]	NCC has agreed PPs for flood authorities with the applicant which have been incorporated into the draft DCO [REP6 030]. Negotiations are ongoing with regard to PPs for highway authorities. We are working closely with Suffolk County Council on PPs, and we can confirm that the version of the highways PPs submitted by SCC in response to this question is also NCC's preferred version.	The Applicant shared an updated set of protective provisions with the local highways authorities in response to comments received from Essex County Council, Suffolk County Council and Norfolk County Council on 3 August. The Applicant provides a detailed review of the drafting differences between the two sets of protective provisions in 8.7 Statutory Undertaker Tracker [Revision G].
			Network Rail Infrastructure Limited [REP7-563]	Our preferred protective provisions are contained within Appendix 1 of our Relevant Representations [RR-2671] upon which Network Rail continues to rely.	The Applicant acknowledges Network Rail's preferred form of protective provisions. The Applicant's preferred form of protective provisions is included in the 3.1 Draft DCO [Revision H] and the 8.7 Statutory Undertaker Tracker [Revision G] includes at Table 2.4 the key differences between the two sets of protective provisions along with the Applicant's justification for the changes.
			Ward Hadaway LLP on behalf of Northumbrian Water Limited [REP7-576]	As you are aware, we are instructed by our client Northumbrian Water Limited ("NWL") (who also operate under the trading name "Essex and Suffolk Water" ("ESW")) in relation to the application for a Development Consent Order ("DCO") submitted by National Grid Electricity Transmission ("the Applicant") in respect of the Norwich to Tilbury Project (the "Project"). We are awaiting a suggested compromise position from the Applicant's solicitor on the issue of cost sharing, a point raised by NWL throughout the Examination. NWL's position is that the cost sharing provisions proposed by the Applicant are inconsistent with our client's published charging arrangements, which NWL is required to apply pursuant to section 185(5) of the Water Industry Act 1991. If the DCO were granted on the basis of the Applicant's	A compromise solution has been discussed with NWL and revised protective provisions have been submitted to resolve this issue. It is noted that the Asset Protection Agreement safeguarding Little Waltham Pumping Station and future planned projects cannot be completed until the form of protective provisions has been agreed. A unilateral agreement securing the same protections has been offered to NWL but not accepted and the same measures secured in the Asset Protection Agreement have also been mirrored in the protective provisions for NWL's benefit included in the draft Order.

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				proposed drafting, it is likely to give rise to significant dispute undermining the efficient delivery of the Project. However, despite our chasing, we have yet to hear back from the Applicant's solicitor and in the absence of an agreed position by the relevant deadline, and in accordance with the ExA's Rule 17 letter dated 14 July, we enclose NWL's preferred Protective Provisions as requested by the Examiner. For the avoidance of doubt, NWL's objection to the Project remains and will continue unless an appropriate Asset Protection Agreement safeguarding Little Waltham Pumping Station and future planned projects has been secured, together with an agreed form of Protective Provisions. <i>[the Applicant notes the IP submitted their version of their protective provisions. These are not repeated here and can be found in the original REP7-576.]</i> <i>The IP provides a summary of the outstanding matters and changes that Ward Hadaway LLP on behalf of Northumbrian Water Limited are seeking.</i>	
			Lower Thames Crossing Project [REP7-559]	Further to reference 1.7 of the Examining Authority's Rule 17 request dated 14 July 2026 [PD-031], NH LTC confirms that it submitted a draft of its preferred protective provisions into Examination at Deadline 6. These can be found in Appendix 2 of NH LTC's deadline 6 submission [REP6 153].	An agreed form of Protective Provisions for the benefit of Lower Thames Crossing have been included on the face of the draft DCO at Deadline 8 (in Part 17 of Schedule 16 to 3.1 Draft Development Consent Order (Revision H)). A detailed summary of the content of those bespoke protective provisions can be found at paragraph 1.11.30 of 8.29.8 Application under Section 127 Planning Act 2008 – National Highways Limited (Revision B) and at table 2.11 in the Appendix to 8.7 Statutory Undertaker Tracker (Revision G).

2.2
Compulsory acquisition and temporary possession of land and rights

Table 2.2
Applicant's comments on Rule 17 matters relating to compulsory acquisition

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
2.4	Affinity Water Ltd Network Rail Infrastructure Ltd Northumbrian Water Ltd	Sec 127/138 applications The applicant has submitted applications under sections 127/138 in respect of the following SUs. The ExA requests responses from the named SUs in respect of those submissions:	Affinity Water [REP7-537]	The Rule 17 letter also refers to the applications made by the Applicant pursuant to sections 127 and 138 of the Planning Act 2008 [REP6-129] and requests Affinity Water's response to those submissions. Affinity Water's position remains that the exercise of powers affecting land in which it owns infrastructure, enjoys property rights or carries out activities necessary to discharge its statutory duties could result in significant prejudice to its	The Applicant responded to Affinity Water's written representation [REP1-197] at the time of its submission in the 8.8.1 Applicant's Comments on Written Representations [REP2-029]. The Applicant stands by its position, as detailed in the 8.29.1 Application under Section 127 Planning Act 2008 – Affinity Water Limited [REP6-129], and including updates to the same document submitted at this Deadline 8

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		a) Affinity Water Ltd [REP6-129] b) bNetwork Rail Infrastructure Ltd [REP6-130] , c) Northumbrian Water Ltd [REP6-131]		undertaking unless appropriate protections are secured within the Order. To note, on the particular detail of REP6-129, Affinity Water notes that at paragraph 1.9.1 it is stated that: “No land owned by Affinity Water needs to be compulsorily acquired; only rights over that land. Therefore, ss.127(2) and (3) of the 2008 Act are not engaged.” This appears incorrect, as paragraph 1.2.2. notes: “For the purposes of s.127, “land” includes any interest in or right over land (as defined in s.159 of the 2008 Act).” Table 1.2 sets out a number of Plots as “Class 1 (in relation to land in which Affinity Water has a right or interest only)” – in respect of those Plots the provisions of ss. 127(2) and (3) do apply to the interests in land that the proposed Order proposes to acquire. As explained in Affinity Water’s Relevant Representation, Affinity Water has substantial operational assets and interests within the Order limits, including infrastructure that is critical to the delivery of water supplies to its customers. Discussions with the Applicant remain ongoing regarding the interaction of the proposed development with those assets, particularly in relation to the proposed routing of elements of the high-voltage network and the extent to which those works may intersect with or otherwise affect Affinity Water’s apparatus and operational interests. Affinity Water’s principal concerns in respect of the Applicant’s applications under sections 127 and 138 include: • the potential impact of the proposed development on assets and land interests which are required for the operation, maintenance, inspection, renewal and replacement of Affinity Water’s infrastructure; • the need to ensure that Affinity Water retains uninterrupted access to its assets at all times; • the risk of operational, maintenance and safety constraints arising from the proposed works and the subsequent operation of the authorised development; and • the adequacy of the protections proposed by the Applicant to safeguard Affinity Water’s statutory undertaking. In particular, Affinity Water has significant interests associated with Ardleigh Reservoir, a strategically important water supply asset operated by the Ardleigh Reservoir Committee, whose members comprise representatives of Affinity Water and Anglian Water Services Limited. The continued operation of the reservoir, together with unrestricted access for inspection, maintenance, repair, renewal and emergency response purposes, is essential to	reflecting further progression on agreeing Protective Provisions. Notwithstanding this, the Applicant makes the following specific observations in response to Affinity Water. The Applicant notes Affinity Water’s comment on the application of section 127 for the acquisition of interests or rights over land. To the extent that there is any proposed acquisition of land in which Affinity Water has interest or right then the same justification and protections for sections 127(2) and (3) would apply and as Affinity Water notes these particular plots are already included in Table 1.2 of the section 127 submission. In particular, paragraph 6 of Protective Provisions for Affinity Water’s benefit included in Schedule 16 of the 3.1 Development Consent Order [Revision F] provides extensive protections for Affinity Water, including requiring Affinity Water’s approval to any use of compulsory acquisition powers under the Order or powers to “acquire, appropriate, extinguish or interfere with any Apparatus or easement or other land interest of Affinity Water” which secures the protection of Affinity Water’s operational assets should the compulsory acquisition powers be exercised. As noted by Affinity Water, discussions on the interaction between the authorised development and Affinity Water’s operational assets and interests remain ongoing. Notwithstanding those discussions, no diversions of Affinity Water’s apparatus are proposed, and the Applicant expects any interests and rights that are acquired would co-exist with those of Affinity Water. Affinity Water goes on to note that its concerns can be appropriately addressed through the inclusion in the Order of protective provisions in the form it enclosed. The Applicant acknowledges the importance of Affinity Water’s apparatus and operational interests and, while these protective provisions are not yet agreed, the substantive protections for Affinity Water are agreed and provide comprehensive protections to manage any interaction without causing any serious detriment to Affinity Water’s undertaking. In particular, the agreed elements of the protective provisions include protections to safeguard Affinity Water’s operation of, and access to, its apparatus. The Applicant intends to continue discussions with Affinity Water after the close of the Examination to further narrow the differences and remains hopeful that full agreement will be reached between the parties.

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				the provision of water supplies to Affinity Water's customers. Accordingly, Affinity Water's primary concern is to ensure that the operation of, and access to, the reservoir are not adversely affected by the Proposed Development. Affinity Water understands that the compulsory acquisition powers sought in relation to the reservoir are principally required to facilitate access and the construction of pylons and should not interfere with the reservoir's ongoing operation. On that basis, Affinity Water's position is that its concerns can be appropriately addressed through the inclusion in the Order of protective provisions in the form enclosed with this letter. Affinity Water considers that those provisions provide the necessary safeguards to ensure that the operation of, and access to, the reservoir are not adversely affected by the Proposed Development, including through consultation requirements in favour of Affinity Water in respect of works that may affect the reservoir. Accordingly, should the protective provisions enclosed with this letter be secured, Affinity Water's concerns regarding prejudice to its undertaking arising from the exercise of powers affecting the reservoir would be addressed. Affinity Water continues to review the material submitted by the Applicant and reserves all of its rights in relation to the applications under sections 127 and 138 pending the outcome of ongoing discussions and agreement of appropriate protective provisions.	
			Network Rail Infrastructure Limited [REP7-563]	NR has previously made submissions on sections 127 and 138 of the Planning Act 2008 in its Written Representations [REP1-252] and relies on the points raised in those submissions. The present response is supplemental to and should be read together with those earlier submissions. While NR notes and welcomes the proposed inclusions referred to by the Applicant under 1.7.12, in particular the suggested clause restricting anything which would render railway property incapable of being used/maintained, the requirement for the Applicant to enter into an asset protection agreement or basic asset protection agreement (as appropriate) and the approval of plans for specified works, these measures alone do not provide sufficient protection for the purposes of sections 127 and 138 of the Planning Act 2008. Those provisions principally regulate the review, design and execution of works in proximity to the railway. They do not adequately restrict or regulate the separate exercise of the Applicant's compulsory acquisition powers over railway property, rights, easements, access arrangements and operational assets. The relevant statutory question under section 127 is whether the rights sought can be acquired without serious detriment	The Applicant responded to Network Rail's written representation [REP1-252] at the time of its submission in the 8.8.1 Applicant's Comments on Written Representations [REP2-029]. Having considered Network Rail's latest comments on the application to its statutory undertaking of the tests under s.127 and s.138 of the Planning Act 2008, the Applicant stands by its own analysis of the position, as detailed in full in the 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [REP6-130] (now, 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [Revision B]). Notwithstanding this, the Applicant makes the following specific observations in response to Network Rail. <u>Section 127</u> As Network Rail notes, "<i>the relevant statutory question under section 127 is whether the rights sought can be acquired without serious detriment to the carrying on of NR's undertaking</i>".

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				to the carrying on of NR's undertaking, or whether any detriment can be made good by the use of other land. The distinct question under section 138 is whether any extinguishment of rights or removal of apparatus is necessary for carrying out the development. In NR's view, the proposed measures identified by the Applicant do not sufficiently address those statutory tests. What is required for that purpose is an effective restriction on the exercise of compulsory acquisition powers affecting railway property, rights and assets without NR's consent, such consent not to be unreasonably withheld or delayed. The purpose of the proposed restriction in NR's preferred protective provisions is not intended to prohibit progress of or frustrate the Scheme. Rather, it is intended to ensure that compulsory acquisition powers affecting railway property, easements, access rights, apparatus and other operational assets cannot be exercised unless and until their effect on NR's undertaking has been properly assessed and appropriate protections are in place. That control is necessary to give practical effect to the statutory protections for statutory undertakers. NR's consent in this regard would not be unreasonably withheld or delayed. NR acknowledges the Applicant's statements at 1.7.10, 1.7.11 and 1.7.15 that any proposed rights to be acquired are intended to co-exist with NRIL's rights and assets. However, the fact that rights may legally co-exist does not mean that their compulsory acquisition would be free from operational conflict or constraint in practice. The acquisition of rights without adequate control, and without the ability to assess fully their scope, timing and operational consequences before vesting, could cause serious detriment to the carrying on of NR's undertaking should compulsory acquisition powers be exercised. For the purposes of section 127(5) and (6), NR does not consider that the Applicant has demonstrated that the rights sought can be acquired without serious detriment to the carrying on of its undertaking. Nor has the Applicant demonstrated that any detriment could be made good by the use of other land. In the case of operational railway access rights, maintenance corridors and interfaces with railway structures, there is frequently no realistic substitute "other land" capable of performing the same operational function. By way of example, where NR holds the benefit of access rights necessary to enable it to inspect, maintain and repair operational track, the Applicant could seek similar overlapping access rights to install and maintain its own infrastructure (e.g. overhead cables). Even if such rights do not formally extinguish NR's own rights, this could interfere with or constrain their exercise in practice. That may, in turn,	If the Applicant were to acquire interests and rights over Network Rail's operational land, this would have no bearing upon and would not override the protective provisions. Therefore, the protections listed in paragraph 1.7.12 of the 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [REP6-130] (now, 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [Revision B]), amongst others that are secured through the protective provisions, would continue to apply to the 'railway property' (as defined) with which those acquired interests and rights interact. The Applicant maintains that any interference caused (if at all) from the acquisition of those rights will not be a serious detriment to Network Rail carrying on its undertaking. This is because: • No diversions of Network Rail's apparatus are proposed, meaning the Applicant expects interests and rights to be acquired to co-exist with those of Network Rail; and • The requirement not to do anything which would result in railway property being incapable of being used or maintained or which would affect the safe running of trains on the railway would apply to that use of compulsory acquisition powers. In practice, the risk of interference with Network Rail carrying on its undertaking therefore comes through the actual delivery of 'specified works' (as defined) in proximity to railway property. As Network Rail acknowledges, the protections included in the protective provisions "<i>regulate the review, design and execution of works in proximity to the railway</i>". Therefore, irrespective of whether the Applicant has been able to secure the interests and rights it needs to construct, operate and maintain the Project, Network Rail would retain control over what the Applicant is proposing to do in respect of its railway property and the Applicant cannot undertake any specified works that have not been approved by Network Rail. Not only is the Applicant required to deliver any specified works in accordance with plans submitted to and approved by Network Rail, but the Applicant must also first have delivered any protective works specified by Network Rail. Inherently, those protective works will be those that Network Rail considers necessary so that the specified works do not cause a serious detriment to the carrying on of its undertaking.

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				delay critical maintenance, repairs, emergency access or other safety related functions to ensure railway safety. Requiring NR's consent prior to acquisition of rights would enable the likely effects of those rights to be assessed in advance and, where appropriate, regulated through tailored protections or interface arrangements so as to manage interference and any co-existence of the proposed rights. NR welcomes the Applicant's engagement with NR's technical teams as set out in paragraph 1.7.18 in respect of construction traffic using railway crossings, access routes and other railway interfaces and expects those discussions to continue. However, should the Applicant be able to exercise compulsory acquisition powers affecting such rights or interfaces without adequate protective control, that could adversely affect NR's ability to manage safe access and egress across the railway, protect the existing access arrangements and maintain operational control of safety-critical interfaces. So far as section 138 is concerned, NR does not consider that the Applicant has demonstrated the necessity for powers of extinguishment or removal in the breadth proposed insofar as they may affect railway rights or apparatus. Asset protection agreements, basic asset protection agreements and approval of plans for specified works may regulate the manner in which works are carried out near the railway, but they do not in themselves establish that extinguishment, removal or interference with railway rights or apparatus is necessary for carrying out the development. NR notes the Applicant's reliance on the Cambridge Waste Water Treatment Plant Relocation Development Consent Order. That decision turned on its own facts, the particular rights sought and the protective provisions in issue. It does not establish that asset protection arrangements and plan approval will always be sufficient to satisfy sections 127 and 138 where operational railway land and rights are affected. NR and the Applicant remain in discussions regarding an appropriate side agreement and the form of protective provisions. However, material issues remain outstanding, including the need for an effective restriction on the exercise of compulsory acquisition powers affecting railway property, rights and apparatus without NR's consent.	Network Rail also has the opportunity to secure further protections through the Applicant's entry into an asset protection agreement, a basic asset protection agreement or both, which is required before the carrying out of any specified work. In any event, the protective provisions as proposed by the Applicant provide Network Rail with the ultimate backstop of the Applicant being required not to do anything which would result in railway property being incapable of being used or maintained or which would affect the safe running of trains on the railway. With this being secured, there can be no serious detriment to the carrying on of Network Rail's undertaking. In this context, the Applicant's preferred form of protective provisions preserve the ability of the Applicant to acquire the necessary rights and interests where Network Rail fails to agree appropriate easement terms (which, for the avoidance of doubt, allow the Applicant's apparatus to be permanently retained in its location) or have otherwise delayed or failed to engage over entry into voluntary easements so as to become an impediment to implementation of the Project. There is recognition in the latest guidance (see paragraph 4.25 of Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order) that protective provisions should not simply negate the principal provisions of the 3.1 Draft DCO [Revision H] and thereby become an impediment to implementation of the Project. The Applicant is of the view that making the use of its compulsory acquisition powers reliant on obtaining Network Rail's prior consent presents an unacceptable risk to the Project's delivery and programme and this could become an impediment to implementation of the Project. The Applicant notes that its preferred position on this point in the protective provisions was accepted by the Secretary of State for Energy Security and Net Zero in the context of its Yorkshire Green project. The Applicant has also adopted this approach in the context of its Sea Link project, which is currently awaiting a decision. <u>Section 138</u> As Network Rail notes, "<i>the distinct question under section 138 is whether any extinguishment of rights or removal of apparatus is necessary for carrying out the development</i>". The Applicant considers that the question of the Project's "necessity" has been well established through its various submissions, not least in paragraph 1.5 of the 8.29.9 Application under Section 127 Planning Act 2008 –

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					Network Rail Infrastructure Limited [REP6-130] (now, 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [Revision B]). The 8.34 Applicant’s Closing Statement with a Summary of Areas of Disagreement rearticulates in Section 7 (Land Rights and Related Matters) the compelling case justifying the compulsory acquisition and temporary possession powers sought. In the absence of powers for the Applicant to ultimately extinguish such rights and/or remove such apparatus, in the event that diversions are required, the Applicant could not guarantee the delivery of the Project. The Applicant agrees with Network Rail that the protections secured through the protective provisions “do not in themselves establish that extinguishment, removal or interference with railway rights or apparatus is necessary for carrying out the development”. However, they are relevant to assuring the Examining Authority and the Secretary of State that, although the powers sought are necessary to guaranteeing the delivery of the Project, Network Rail retains control over what the Applicant is proposing to do in respect of railway property and that the Applicant cannot extinguish or remove the rights of Network Rail if to do so would render railway property incapable of being used or maintained. <u>Cambridge Waste Water Treatment Plant Relocation Development Consent Order</u> The Applicant considers the reasoning of the Secretary of State for Environment, Food and Rural Affairs to be noteworthy, with the reasons given for the decision on this point reflecting the arguments advanced by the Applicant in the 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [REP6-130] (now, 8.29.9 Application under Section 127 Planning Act 2008 – Network Rail Infrastructure Limited [Revision B]) and further developed in this response. However, the Applicant acknowledges that the Examining Authority and the Secretary of State must consider this application on its merits and that they are not bound to follow the recent determination of this point in the context of the Cambridge Waste Water Treatment Plant Relocation Development Consent Order. The Applicant intends to continue discussions with Network Rail after the close of the Examination and remains hopeful that full agreement will be reached between the parties.

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2.7	National Highways All local highway authorities: Norfolk County Council Suffolk County Council Essex County Council Thurrock Council	Compulsory acquisition of operational highway Notwithstanding your reply to question 1.7 above, please confirm if the applicants submitted PPs, (or other mechanisms secured in the draft DCO) ensure that if compulsory acquisition powers are approved the highway authority will be able to ensure operation of the public highway.	Essex County Council [REP7-553]	ECC is not aware of any land that may be subject to compulsory acquisition powers that would affect the operation of the public highway	The Applicant notes ECC's comments.
			Suffolk County Council [REP7-572]	No discussions have taken place between the Applicant and SCC in respect of the compulsory acquisition of highway land within SCC's administrative area. Save for the powers set out in Schedules 5, 6, 7, 8, 19 and 13 (and assuming the proposed highway works can be properly controlled by appropriate protective provisions) SCC does not agree to any restrictions being placed upon its highway rights.	The Applicant notes SCC's comments and considers that the protective provisions in favour of the local highway authorities offer sufficient protection to enable safe operation of the public highway.
			National Highways [REP7-561]	No. The Applicant's proposed PPs do not ensure the safe operation of the public highway. The Applicant's proposed PPs do not offer this protection. Instead, they restrict the exercise of compulsory acquisition powers only over Class 1 land without NH's consent. 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. Left uncontrolled and/or without proportionate safeguards, the Applicant's PP's carry significant safety risks. NH's position has always been, and remains, that the Applicant should not exercise any Compulsory Acquisition powers (including Temporary Possession) over any part of the SRN, or over any other land in which NH has an interest, without NH's consent. NH's proposed PPs at Appendix 1 secure this position. <i>[the Applicant notes National Highways submitted their version of their protective provisions. These are not replicated in this document – please see REP7-561 for the drafted protective provisions.]</i>	As detailed in 8.34 Applicant's closing statement with a summary of areas of disagreement [Revision A] and 8.4.18 Applicant's Comments on any Further Information or Submissions Received by Deadline 7 [Revision A] but repeated here for ease of reference, 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. Without voluntary agreement of these easements, the Applicant's ability to exercise compulsory acquisition powers to acquire these rights must be retained within the protective provisions in favour of National Highways. 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.

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					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 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,

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					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

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					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 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.
			Thurrock Council [REP7-575]	5.1 The Council is currently negotiating a draft Framework Highways Agreement which will be submitted by the Applicant. The Council does not anticipate there being any issues with the operation of the public highway.	The Applicant is committed to continuing negotiations with Thurrock Council to agree a Framework Highways Agreement following the close of Examination. In any event, the Applicant considers that the protective

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					provisions in favour of the local highway authorities offer sufficient protection to enable safe operation of the public highway.
			Norfolk County Council [REP7-564]	NCC is content that the protective provisions submitted by Suffolk County Council in response to 1.7 would be sufficient to ensure operation of the public highway. In general, NCC’s right to operate and maintain highways land is on a statutory footing and independent of land ownership. It is rare that holds a freehold interest in highways land.	The Applicant’s position is that the protective provisions in favour of the local highway authorities as included in the 3.1 Draft DCO [Revision H] offer sufficient protection to enable safe operation of the public highway. The Applicant provides further detail on the drafting of the protective provisions in the 8.7 Statutory Undertaker Tracker [Revision G] .

2.3
Biodiversity, ecology and the natural environment

Table 2.3
Applicant’s comments on Rule 17 matters relating to biodiversity

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
3.1	Applicant All local authorities Natural England	Assessment of impacts on bat species and proposed mitigation In paragraphs 6.1.11 to 6.1.14 of the revised version of the outline LEMP [REP6-084], the applicant has included further details of mitigation measures for bat species. To the applicant: For the sake of consistency clarify whether the references made within [REP6 084] to “preliminary roost features” are the same as the “potential roost features” references that are stated in the Bat Roost Report [AS-034] and amend accordingly. Furthermore, confirm that all trees that have currently been classified “further assessment required”	Babergh and Mid-Suffolk District Council [REP7-541]	The Deadline 6 Outline LEMP (REP6-085) contains new text necessary to agree matters previously outstanding, relating to bat roost tree resource compensation. The Deadline 6 Outline LEMP (REP6-085) and Outline CoCP (REP6-073) both contain new text necessary to agree SoCG matters 3.3.16 and 3.3.17. With respect to BNG matters in the SoCG matters, the pre-mandatory NSIP BNG status of the project affords the applicant greater control of their BNG methods, and generally speaking, those methods are in accordance with general BNG standards. However, in comparison to DEFRA’s recently released <i>NSIPs: Biodiversity Gain Statement for Energy Requirements</i> , the applicant’s assessment of their on-site habitat reinstatement as all temporary impact and non-significant (and therefore not needing 30 years’ management to be counted) is rather questionable.	The Applicant notes Babergh and Mid-Suffolk District Council response on this matter. As recorded in 5.9.6 Signed Statement of Common Ground – Babergh and Mid Suffolk District Council [REP7-104] ID 3.3.6 Survey Methodology (Bats) agreement has been reached with respect to the potential bat roost tree compensation. The Applicant’s approach to replacement planting and justification for its inclusion within the BNG metric has been set out in paragraphs 3.5.2 to 3.5.7 of 7.1 Biodiversity Net Gain Report [REP7-320] . In April 2026 the ‘Summary of responses and government response’ was published following the consultation on the implementation of BNG for NSIPs consultation. The Government’s response confirmed that <i>‘reinstatement of existing habitats (replacing a temporary loss of habitat with the same habitat type and conditions) is considered non-significant and does not need to be secured. This approach is intended to create more certainty on what is considered significant and resolves the issue set out above on land being returned to its previous owner and use’</i> . The Applicant’s approach is therefore supported by the approach that will be taken to BNG for NSIPs when it becomes mandatory in November 2026.
			Essex County Council [REP7-553] Replicated/endorsed by: Chelmsford City Council [REP7-548] Brentwood Borough Council [REP7-546]	ECC notes that following extensive discussions, the Applicant has agreed a bat box compensation strategy to resolve concerns regarding the loss of trees providing bat roosting habitat first outlined in the Council’s LIR [REP1-161]. In particular, ECC welcomes the commitment to provide bat boxes and/or veteranisation of retained trees, equating to 10% of the total number of	

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		as per [AS-034] would be assessed in order to determine the presence or absence of potential roost features. Also, justify why the use of a 10% figure for bat boxes and/ or tree veteranisation for trees with potential roost features that you have cited in paragraph 6.1.12 of [REP6-084] would provide an adequate level of mitigation.		trees with potential roost features to be removed, across the Project as set out in Paragraph 6.1.12 of the Outline Landscape and Ecological Management [Revision G] submitted at Deadline 6 [REP6-084] . This agreement is reflected in the SoCG as submitted at Deadline 7.	Statement of Common Ground - Brentwood Borough Council [REP7-114] , agreement has been reach on the mitigation for potential bat roosting habitat.
			Natural England [REP7-562] Endorsed by Norfolk County Council [REP7-564]	Natural England's position is as set out in our Statement of Common Ground with the applicant and previous correspondence submitted to the examining authority. Natural England remains engaged with the scheme's ecological consultants to establish a licensable approach, informed by appropriate survey effort. Broad principles of bat mitigation and approach to bat licensing have been agreed with the Applicant. Natural England has provided the applicant with an advice letter providing further direction on licensable approaches.	The proposed provision of artificial roosting features (boxes/ veteranisation) on a 10% basis is to account for short-term loss of <u>potential</u> roosting features and not confirmed bat roosts. As this mitigation is not for confirmed bat roosts, it therefore sits outside the remit of Natural England. The broad principles of mitigation for loss of confirmed bat roosts have been agreed with Natural England as recorded in the signed 5.9.13 Signed Statement of Common Ground – Natural England [REP7-118] under ID 3.2.27.
		To all local authorities and Natural England: Comment on whether the amendments made to the revised outline LEMP [REP6-084] now satisfy your concerns in relation to the assessment of impacts on bats and proposed mitigation. This should include whether you think the 10% figure, as proposed in paragraph 6.1.12, would be sufficient. If you have any remaining concerns then please set these out, including what specific actions you consider should be undertaken by the applicant to resolve your concerns.	South Norfolk District Council [REP7-571]	It is requested, in line with Bat Mitigation guidelines, that it be amended to follow a hierarchical approach and provide different % and types of bat box depending on the PRFs lost. Tree roosting bats tend to move roost frequently so the entirety of the tree resource available for bats needs to be considered. Compensation of 10% of trees lost is considered too low (i.e. 10 single bat boxes for every 100 trees lost (trees often contain multiple bat roost features). The LEMP needs to be clear that consideration will be given to the veteranisation of trees in the first instance, with evidence provided if this is not possible. The following hierarchy is suggested for consideration: For PRF-I where the PRF is only suitable for individual bats or very small numbers)– provision of at least 30%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree • Consider if tree can be partially retained, if yes, then veteranize the tree with 2 -3 features • Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes: – Schwegler 2F bat box, and/or – Schwegler 1FF bat box, and/or – Schwegler 1FD bat box. For PRF-M, where the PRF is suitable for multiple bats and may be used by a maternity colony, provision of at least 20%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree	The Applicant maintains its position that a provision of bat boxes/veteranisation equating to 10% of the potential roosting features lost is sufficient given this is short-term mitigation for potential roosts only (not confirmed bat roosts) and there is significant other available potential roosting habitat in the wider area, as previously justified within 8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533] . The Applicant deems the suggested increase of bat boxes to be unnecessary and not supported by a clear ecological driver. The Applicant has agreed to providing artificial roost features on a 10% basis with the majority of other relevant stakeholders and appropriate wording been added to 7.4 Outline Landscape and Ecological Management Plan [REP7-342] . 7.4 Outline Landscape and Ecological Management Plan [REP7-342] provides guidance on what needs to be considered when locating an artificial roost feature. Roost features would not be recycled as this presents a health and safety risk. As standard mitigation the mitigation hierarchy is to be followed as set out in paragraph 1.1.7 in 7.4 Outline Landscape and Ecological Management Plan [REP7-342] . All mitigation that will take place on this Project will be overseen by a team of suitably qualified professionals.

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
				- Consider if tree can be partially retained, if yes, then veteranize the tree with 4 -6 features - Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes: - Schwegler 1FF bat box, or - Schwegler 1FS or 1 FW Colony Bat Box, and/or - Miramare Woodstone Bat box, and/or - Schwegler 3FF bat box A plan showing the location of the compensatory roosts needs providing to the LPA. Bat boxes need to be installed by a licensed bat worker as EcOW are not necessarily suitably qualified or experienced to advise on the location.	
			Suffolk County Council [REP7-572]	SCC (Ecology) are content with the amendments detailed in this question.	The Applicant welcomes Suffolk County Council's response on this matter. As recorded in 5.9.2 Signed Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) [REP7-096] , agreement has been reached on the mitigation for potential bat roosting habitat.
			Thurrock Council [REP7-575]	6.1 The Council considers 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. We would expect a ratio closer to 4:1 with this getting closer to 1:1 for PRF-M trees. 6.2 The Council 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.	The Applicant maintains its position that a provision of bat boxes/veteranisation equating to 10 % of the potential roosting features lost, is sufficient given this is short-term mitigation for potential roosts only (not confirmed bat roosts), there is significant 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 the 7.4 Outline Landscape and Ecological Management Plan [REP7-342]. 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 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.

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
			Braintree District Council [REP7-545]	The Council notes that, following discussions with the Applicant and its ecological advisors, agreement has been reached regarding the approach to bat roost compensation. The Council welcomes the Applicant's commitment to provide compensation not only for confirmed bat roosts but also for the loss of trees containing potential roost features (PRF-I and PRF-M), through the provision of bat boxes and/or veteranisation of retained trees. As this has been included within the Deadline 6 Outline Landscape and Ecological Management Plan (REP6-084), including a commitment to provide compensation features equivalent to 10% of the total number of trees with potential roost features to be removed, the Council considers this matter to be addressed.	The Applicant welcomes Braintree District Council's response on this matter. As recorded in 5.9.9 Signed Statement of Common Ground - Braintree District Council [REP7-110] , agreement has been reached on the mitigation for potential bat roosting habitat.
			Colchester City Council [REP7-549]	This does address our concerns as set out in our SoCG.	The Applicant welcomes Colchester City Council's response on this matter. As recorded in 5.9.8 Signed Statement of Common Ground - Colchester City Council [REP7-108] , agreement has been reached on the mitigation for potential bat roosting habitat.

2.4 Historic Environment

Table 2.4 Applicant's comments on Rule 17 matters relating to the historic environment

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
4.1	Historic England	Bush Hall non-designated heritage asset (NDHA) The Code of Construction Practice [REP6-072] contains new proposed restrictions to ensure that proposed pylons RG68 and RG87 do not move to the south or east respectively to prevent physical impact to Bush Hall. Please confirm if this allays your concerns relating to this NDHA.	Historic England [REP7-557]	Historic England have reviewed [REP6-072] <i>Norwich to Tilbury Volume 7: Other Documents Document: 7.2 Outline Code of Construction Practice - Clean Version Final Issue F (July 2026)</i> specifically Commitment Reference GG34, and Commitments RG86/87, which refer to Bush Hall We confirm that we support the addition of these commitments in relation to Bush Hall and consider these to be appropriate. We would ask the applicant to confirm how these will be implemented in the event that the application is approved. This can be done post consent but prior to works commencing.	The Applicant notes Historic England's response. The pylon working areas would be fenced during construction works, which would prevent any accidental impact beyond the working area.

2.5 Land use and soils, green infrastructure

2.5.1 No third party responses to questions on this topic were received at Deadline 7.

2.6 Landscape and visual

Table 2.5 Applicant’s comments on Rule 17 matters relating to landscape and visual

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
6.1	Applicant	Residential Visual Amenity Assessment (RVAA) A number of IPs raise concern over the accuracy of the information contained within the RVAA. Respond to such concerns, specifically, representations over the accuracy of measurements used in the RVAA, the accuracy of RVAA visualisations (the ExA notes in this respect that the visualisations are not verified views as data has not been collected in person), and representations over the 200m distance as taken from properties’ curtilages [REP6-212], [REP6 218] [REP6-203], [REP6-212], [REP6-229].	Braintree District Council [REP7-545]	This question is not directed at the Local Authorities. However, the Council would take this opportunity to signpost the ExA to our Deadline 6 response [REP6-139] in section 5.2, where it is requested that GG34 in the oCoCP is updated to fix the position of pylons TB93-94 and TB97-98 to limit the potential for additional RVAA effects arising from the use of Limits of Deviation.	The response is noted. The concerns raised in regard to measurements within the RVAA have been addressed in 6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment [REP7-268 and REP7-270] submitted at Deadline 7. The concerns regarding representations over the 200 m distance are addressed in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 2 [REP7-270] submitted at Deadline 7. In regard to the accuracy of the visualisations the applicant’s position in respect of visualisations for the RVAA are set out 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 Applicant confirms the position that the Project would cause a high magnitude of visual effect for receptors affected by pylons TB93 and TB94, taking into consideration the movement of the Project within the LoD. The RVAA found that it would not be so harmful that it would breach the RVAT. On this basis the applicant would consider there is no reasonable cause to restrict the LoD in this area.
			Babergh and Mid-Suffolk District Council [REP7-541]	BMSDC defer to the response of SCC recognising that the proposed mechanism seeks to pay funding to the county councils. BMSDC expect to participate in the delivery of mitigation in collaboration with SCC and consultation with local communities.	SCC did not provide a response to this specific question at Deadline 7. Responses to other SCC responses relating to landscape and visual topics are provided below in this table.
6.2	Applicant All local authorities	Masterplans A number of IPs have made representations at deadline 6 concerning the Masterplans [REP5 199]. The ExA acknowledge that these plans have been produced in consultation with local authorities, their draft status, and that such plans are illustrative in nature. The ExA also note the applicant’s point of view, as made in ISH4 and restated in [REP6-118] that the provisions within the masterplans are not necessary to make the	Essex County Council [REP7-553] Endorsed/replicated by: Braintree District Council [REP7-545] Chelmsford City Council [REP7-548]	ECC's previous comments regarding the masterplans remain applicable. In particular, whilst the inclusion of references to the Local Nature Recovery Strategy (LNRS) is welcomed, ECC considers that the masterplans are illustrative in nature and do not demonstrate the consistent use of LNRS mapping as a core strategic evidence layer to inform the identification and spatial alignment of mitigation, compensation and enhancement opportunities across the Project. ECC also notes that many opportunities identified remain subject to further landowner engagement and agreement, resulting in uncertainty regarding delivery. Whilst recognising that the detailed operation, administration and governance of the proposed funding mechanism may require input from several teams, including Finance, the Applicants recommendation that this should be discussed further with the relevant local planning	The Applicant notes Essex County Council’s comments. The Applicant has worked collaboratively with the relevant authorities, including Essex County Council, to agree the drafting of Schedule 20, which has been included on a blue-pencil basis within 3.1 Draft DCO [Revision H] . Schedule 20 establishes the framework for the administration and use of the landscape compensation funds and includes eligibility criteria for compensation, enhancement and offsetting measures. These provisions have been developed in consultation with, and agreed by, the relevant councils, including Essex County Council. The Applicant considers that the agreed Schedule 20 provides a robust and deliverable mechanism for the identification and delivery of landscape compensation, enhancement and offsetting measures.

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
		application acceptable in planning terms. To the applicant: a) While accepting the illustrative nature of the plans, some information submitted from IPs could be usefully incorporated within the masterplans. For instance (but not limited to), Aldham Parish Council [REP6-175] identify a number of veteran trees and notable trees from the Woodland Trust Ancient Tree Inventory that do not appear on the constraints plans. Consider whether the plans should be updated and resubmit if necessary. b) The ExA would appreciate further information on the preferred method of the applicant to deal with the matter via an article in the DCO and how this was dealt with in the London Luton DCO (noting the applicant caveat that compensation for residual landscape and visual effects is not required pursuant to the legal and policy framework). To all local authorities: a) Provide your views on the potential mechanism provided by the applicant to provide funding for provision of landscape compensation (as contained in Annex of [REP6-118]).		authorities is agreed. ECC considers that, in principle, the funding mechanism set out in Annex A of REP6-118 could provide an appropriate framework for enabling the delivery of locally targeted GI, landscape and environmental enhancement measures, should the Secretary of State conclude that landscape compensation is justified and necessary. The proposed provision for contributions to be held separately, applied to defined landscape compensation, enhancement and offsetting measures, and administered through the relevant authority is potentially viable. It potentially provides a clearer and potentially more deliverable framework than the illustrative masterplans alone. The inclusion of measures relating to woodland creation, hedgerow restoration, habitat connectivity, public rights of way improvements and wider GI enhancement is particularly welcomed. ECC considers that, where practicable, the selection and delivery of compensation, enhancement and offsetting measures should be informed by relevant LNRS priorities, GI objectives and opportunities to strengthen ecological connectivity, habitat networks and landscape-scale nature recovery. The inclusion of explicit reference to LNRS priorities within the mechanism would provide greater confidence that funding is being directed towards strategically targeted environmental outcomes. ECC recognises that the landscape compensation is proposed to be secured by a Requirement. ECC provided commentary to the Applicant on this matter, and the Applicant has provided a response which is currently being reviewed. ECC is supportive of the Applicant's offer for landscape compensation, however there are concerns with regards to the lack of commitment from the Applicant on this important need for landscape compensation which has been raised repeatedly by the County Council throughout its engagement with the Applicant. This matter is discussed further within ECC's SoCG and will be included within ECC's Closing Statement.	The Applicant considers that the concerns previously raised regarding the delivery and governance of the compensation mechanism have been appropriately addressed through the agreed drafting.
			Colchester City Council [REP7-549]	CCC support the correct plotting of all Vetran Trees as set out in the SoCG and thank Aldham Parish Council for noting these. With regard to the mechanism for funding, CCC will defer to ECC on this matter.	Noted.
			South Norfolk District Council [REP7-571]	The addition of Schedule 20 into the Draft DCO for landscape compensation proposes to offer payments to the County Council's for off-site tree planting and SNDC support this.	The Applicant notes South Norfolk District Council's response.

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
			Suffolk County Council [REP7-572]	In regard to c), in principle (and noting that the Applicant has put this forward without prejudice to its case that no measures for landscape compensation are necessary), the mechanism in the proposed Article 55 and Schedule 20 are acceptable. SCC and BMSDC have been in discussion with the Applicant regarding the details of the drafting as proposed and has provided minor amendments. Discussions have also continued regarding the monetary values associated with each location. The Councils understand that the Applicant will provide an updated Schedule 20 to reflect suggested amendments at Deadline 7, and SCC will respond at Deadline 8.	The Applicant notes Suffolk County Council's response. The Applicant has worked collaboratively with the relevant authorities, including Suffolk County Council, to agree the drafting of Schedule 20, which has been included on a blue-pencil basis within 3.1 Draft DCO [Revision H].
			Norfolk County Council [REP7-564]	NCC is broadly content with the mechanism and we consider that it is capable of meeting the tests in 4.1.16 and 4.1.18 of EN-1 (2024), notwithstanding that this mechanism is, strictly speaking, not either a requirement or a development consent obligation as defined in footnotes 96 and 97, respectively, of EN-1. 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 do not expect these matters to be controversial and expect that the next version of proposed schedule 20 should account for our suggestions.	The Applicant notes Norfolk County Council's response. The Applicant has worked collaboratively with the relevant authorities, including Norfolk County Council, to agree the drafting of Schedule 20, which has been included on a blue-pencil basis within 3.1 Draft DCO [Revision H].
			Thurrock Council [REP7-575]	7.1 Thurrock Council has reviewed the Applicant's proposed landscape compensation mechanism. The Council's position on landscape compensation is included in its response to the Examining Authority's (ExA) Issue Specific Hearing Action Points [REP6-170]; <i>"the Council is concerned by the Applicant's position on landscape enhancement and compensation, which was confirmed at ISH 4, that no agreement will be entered into unless it is deemed strictly necessary. The Council considers that landscape compensation measures are required to mitigate the residual landscape and visual effects of the project and to offset the resulting harm experienced by the public."</i> 7.2 The Council is aligned with the other host local authorities in the pursuit of a sufficient Section 106 unilateral undertaking to deliver additional landscape planting and enhancement. However, the Council has not	The Applicant notes Thurrock Council's response. Whilst the Applicant has maintained its position in relation to the requirement for landscape compensation, the Applicant has been pro-active to negotiate and include a mechanism in 3.1 Draft DCO [Revision H] at Deadline 7 to secure the measures should the Secretary of State deem them required. The feedback received from Thurrock Council in advance of Deadline 7 which was incorporated into the updated drafting of Schedule 20. The Applicant has now agreed the drafting of Schedule 20 with the Council and included this on a blue pencil basis in 3.1 Draft DCO [Revision H].

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
				had sufficient time to review the legal or policy requirement for landscape compensation, offsetting and enhancement. On this basis, the Council would defer to Essex County Council for the explanation of the legal necessity for landscape compensation of the proposed Project. 7.3 Additionally, the Applicant has not agreed to a Section 106 agreement and instead has proposed a draft DCO provision; Article 55 Schedule 20 landscape compensation, offsetting, and enhancement in relation to specified locations [REP6-118]. The Council reviewed this Schedule and was mostly satisfied but had some concerns regarding the Location Specific Compensation Opportunities Criteria, the geographic extent of the compensation area, and the size and deliverability of the fund. However, since the publication of this Annex [REP6-118] the Council has engaged in discussions with the Applicant which has resolved some of its previous concerns. 7.4 The Applicant identified land at Tilbury North, within the vicinity of the proposed Tilbury North substation, as a potential location for landscape compensation measures. The landscape in this area has experienced gradual degradation as a result of successive infrastructure and development pressures, including major road networks, electricity transmission infrastructure, residential expansion, mineral extraction, high intensity farming and leisure-related development. Existing landscape features are fragmented, comprising small isolated woodland blocks and remnant boundary hedgerow and scattered areas of regenerating scrubland often associated with previously developed land. In areas where villages have expanded, the urban-rural interface is often weak with little landscape structure to integrate the urban edge with the more rural landscape. Based on this assessment, opportunities for landscape enhancement exist across the wider area, particularly through; Restoration of hedgerow networks; Strengthening weak settlement edges; Enhancement of degraded rural character areas; Integration of development with the wider landscape. 7.5 The Council was concerned that any landscape compensation works would be constrained within a 2 km distance from the pylon route. The landscape that has been identified is experiencing substantial cumulative change from existing and planned infrastructure and development including the Lower Thames Crossing DCO and other proposed and recent residential and leisure development. Following discussions, the Applicant has since increased this to a 3 km distance from the pylon route.	

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				7.6 The Applicant's proposed masterplans [REP5-199] would benefit from a written explanation with the proposals. The proposals are very high level, and the Council would require further detail as the plans seem aspirational rather than deliverable. The Council would also require further information regarding the land ownership of the proposals suggested and how consultation with landowners would be carried out. 7.7 The Council was concerned that the proposed £250,000 compensation fund may be insufficient to deliver meaningful landscape enhancement at a scale proportionate to the project's impacts. 7.8 Following discussions with the Applicant including consideration of: The potential use of third-sector delivery partners; The removal of any expectation that land would need to be purchased; Reduced legal and land assembly requirements; and Greater flexibility in how projects may be developed and delivered, Thurrock Council and the Applicant agreed a revised compensation fund of £300,000. A fund of approximately £300,000 should provide sufficient scope to deliver a targeted programme of landscape enhancement focused on priority locations and measures. 7.9 A fund of approximately £300,000 should provide sufficient scope to deliver a targeted programme of landscape enhancement focused on priority locations and measures. 7.10 Included within this figure is £50,000 to facilitate landscape enhancement measures in areas shown in the masterplans. This addresses the omission of opportunities south of the substation. 7.11 A further £50,000 would provide a proportionate allowance for project development, coordination, stakeholder engagement, landowner liaison, feasibility work and project management necessary to bring forward deliverable projects over the lifetime of the project. 7.12 The Council was also concerned that the proposed requirement to spend the fund within ten years, together with the restriction of administration costs to 10% of the fund value, could unnecessarily constraints its ability to develop, secure and deliver effective landscape compensation projects. This has since been increased by the Applicant to 15% of the fund value which the Council considers sufficient. 7.13 Given the modest scale of the proposed fund and the Council's desire to maximise investment in physical	

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
				landscape enhancement, monitoring and reporting requirements should be proportionate and should not divert significant resources away from delivery. 7.14 The Council emphasised in discussions with the Applicant it would support a light-touch monitoring regime, consisting of a simple annual report. As a result, the Applicant has updated the Article wording to detail a simple annual reporting mechanism the Council is satisfied with. 7.15 The Council would like to reiterate that Thurrock Council is unparished and a unitary authority and is not to be included in the provisions being made in the administrative county of Essex for Place Services to administer funds on behalf of constituent Districts in the County of Essex. Although this matter is being considered elsewhere during the Examination, the Council wishes to reiterate the importance of ensuring that, in light of anticipated local government reorganisation, provisions should be included to ensure any successor authority can assume responsibility for administering the fund. 7.16 As Thurrock Council Officers mentioned at a meeting on Thursday 9 July 2026 the annotation of the map in 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199] should not refer to the site is Chadwell St Mary as “Proposed Chadwell St Mary Housing Allocation”. The Assessor should be advised that there is no such allocation in the adopted Development Plan Documents for Thurrock and the emerging Local Plan has not, to date, formally proceeded further than Regulation 18 Consultation. Regulation 18 considered site options, not proposed allocation, therefore if the site is to remain within the material it needs to be amended to Chadwell St Mary Initial Proposals Site. If matters progress and authority for Regulation 19 Publication is resolved the status of the site would be updated and we can advise accordingly.	
6.3	Applicant	Good design and lighting controls The ExA notes the submission of the amended Design and Access Statement (DAS) [REP6-090] and Design Approach for Site Specific Infrastructure (DASSI) [REP6-092]. a) The DASSI states that the operational lighting at the proposed East Anglian Connection Node (EACN) substation will “have regard” to the Dedham Vale Lighting Design Guide. Should such	Colchester City Council [REP7-549]	Whilst not directed at CCC, very briefly we would like to suggest the following: a) Should state ‘must comply with’ for absolute clarity. b) It would and there is no reason the other items listed should not comply. c) CCC do not wish to comment. CCC suggest that such a requirement would be appropriate and thank Pylons East Anglia for the suggestion which is eminently sensible and justified.	In response to Part a) the Applicant considers a proportionate and reasonable amendment was made in the updated 7.16 Design Approach for Site Specific Infrastructure [REP7-373] submitted at Deadline 7 where the wording was further strengthened to confirm the lighting would 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. The Applicant is concerned that any wording that requires strict compliance could jeopardise suitable minor variations to achieve Health and Safety requirements even though compliance to the main principles would be achieved.

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		wording be strengthened, and if not, why not?			In response to Part b) the applicant confirmed that subject to adherence with HSE requirements, it is considered that the lighting proposal at all substation sites would be ‘substantially in accordance with’ specifications set out in the Dedham Vale Lighting Design Guide.
		b) Would similar wording as for (a) be useful for all substations, extensions and sealing end compounds? While not all are within the setting of the National Landscape, the use of dark skies principles for such lighting would seem appropriate in such rural areas. The ExA note in this respect the submissions of Burstall Parish Council at deadline 6 [REP6-143] and their existing issues of light pollution.			7.16 Design Approach for Site Specific Infrastructure [REP7-373] is secured as a Certified Document in Schedule 19 of the of 3.1 Draft Development Consent Order [Revision H] . In addition, under normal operational conditions there is no lighting requirements at substations during the evening and/or night time. It would therefore be unreasonable and not necessary to include a further control mechanism via a standalone DCO Requirement.
		c) In particular around the EACN and Burstall, how will potential cumulative lighting issues be dealt with given other works potentially happening in their vicinity?	Suffolk County Council [REP7-572]	SCC considers that dark skies should be protected across Suffolk, as far as possible, and the Applicant should seek to apply the principles of the Dedham Vale Lighting Design Guide at all substations, extensions and sealing end compounds, in particular around the Bramford/Burstall area. SCC would support a requirement for a lighting design strategy to be included in the DCO for approval by the relevant discharging authority.	As set out in the Applicant’s response to this question in 8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533] , under normal operational conditions there is no lighting requirements. All National Grid substations are typically unmanned, therefore the use of the substation lighting on substation buildings during the evening or night time is limited to fault response activities by the call out engineers or security call outs when the security team or police respond to a security alarm; in all other circumstances the substation lighting is off. Outside of working hours, it is only infrequent additional task lighting that may be required when undertaking specific maintenance activities. Furthermore, the Dedham Vale Lighting Design Guide aligns with the lighting measures already set out within 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] . Primarily, the Operational Lighting Management Strategy also includes measures for directional lighting and typical lux levels.
		d) Pylons East Anglia [REP6-229] note that the Cambridge Waste Water Treatment DCO included a requirement for a lighting design strategy. Would such a requirement be appropriate in this case, and if not, why not?			As stated in Commitment GG26 in 7.2 Outline Code of Construction Practice [Revision H] (the CoCP), ‘Construction lighting will be of the lowest luminosity to safely perform each task and include motion sensors or be switched off when not in use where it is safe and efficient to do so. Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task-specific lighting will be directed to reduce intrusion so far as is reasonably practicable, and considered by all necessary specialists’. The CoCP is secured through Requirement 4 of 3.1 Draft DCO [Revision H] and the DASSI is secured as a Certified Document in Schedule 19 of the of 3.1 Draft DCO [Revision H] . The Applicant has updated Commitment GG26 in the CoCP following engagement with Suffolk

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					County Council to secure that where the Project is ‘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.’ The wording in 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] has also been strengthened to state that the 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. Accordingly, the Applicant does not consider that a lighting specific Requirement is necessary.
6.4	Applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	Good design The ExA notes the design review panel (DRP) proposals contained within the DAS [REP6-090] and DASSI [REP6-092] and the provisions for local planning authorities, Dedham Vale National Landscape officials, wildlife trust representatives and North Falls and Five Estuaries project representatives to be invited to meetings where relevant. To the applicant: a) How often is the DRP likely to meet and at what stages of the process will the DRP have input into the design? b) Notwithstanding issues of safety regulation and security, what powers or control or influence will the DRP have and how will this be secured? c) The more formal inclusion of the environmental areas around the cable sealing ends for DRP review would seem useful. A similar table to table 6.1 of the DASSI should be provided in this regard to provide more certainty than currently exists within the DASSI.	Babergh and Mid-Suffolk District Council [REP7-541] Suffolk County Council [REP7-572] [Defers to BMSDC] Essex County Council [REP7-553] Endorsed/replicated by: Chelmsford City Council [REP7-548] Braintree District Council [REP7-545]	BMSDC welcome the revisions to requirement 12 in respect of the scope of matters to be considered by the DRP and the mechanism for approval of some details by the LPAs. BMSDC also welcome the statement at 6.2.32 to invite the LPAs and National Landscape team to be part of the DRP. It is critical for the LPAs to be appropriately involved in the decision making process to represent the interests of the affected communities, businesses and environments. The DASSI is unclear as to precisely how the LPAs will be involved and the weight given to LPA participation in decision making. BMSDC therefore look forward to further discussion on this matter. Please also refer to BMSDC’s submission at D6 REP6-135 ECC would wish to refer to part 3.2.7 regarding design within its SoCG. The Council has reviewed the Design Review Panel (DRP) proposals contained within the Design and Access Statement [REP6-090] and welcomes the detail provided regarding the proposed governance arrangements, membership, scope and review stages. In particular, the Council supports the inclusion of local planning authorities and other relevant stakeholders within the review process where appropriate. However, there are concerns that the DAS [REP6-090] refers to this as a GGP-led design review panel, additionally the Design Development Champion is also a “senior figure from National Grid”, and the Design Executive is the design team at the delivery stage. This raises a question as to the impartiality of the design processes around the project; for the design review process to be robust, the design panel must be independent balancing the need for functionality and	The Applicant welcomes this feedback from Babergh and Mid-Suffolk District Council. The Applicant has sought to address this request for further information on the role of the Design Review Panel within the latest version of 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] submitted at Deadline 7. Prior to the commencement of the formal design reviews, the Applicant will hold an introductory workshop following the close of the Examination to provide local authorities and other external participants with further details on the design review process, governance arrangements and review protocols (including terms of reference). This workshop would also incorporate the presentation on link pillars which was discussed at Issue Specific Hearing 4 on 25 June 2026. The Applicant welcomes the feedback from Essex County Council regarding the Design Review Panel (DRP) governance arrangements. The Applicant notes the concern regarding the appointment of a senior figure within National Grid as the Design Development Champion. The Applicant has intentionally selected the Design Development Champion from within the existing project team due to their significant experience and detailed knowledge of the Project's development to date. Notably, the Design Development Champion is separate from the Great Grid Partnership (GGP). The Applicant has onboarded the Great Grid Partnership in a design review capacity separate to the internal National Grid project team. The GGP provides an additional layer of design governance, technical assurance and design review, providing a degree of separation, or "informed independence", from the internal

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		To all local authorities and the Wildlife Trusts: d) dProvide your views on the DRP proposals and any other final comments you wish to make on the subject of good design.		security, whilst delivering the best local design and environmental outcomes for the project. However, the Council notes that the DRP is advisory in nature and that responsibility for final design decisions remains with the Design Executive. Whilst the Council accepts that operational, engineering, safety and security requirements will inevitably limit the degree of design flexibility available for electricity transmission infrastructure, the effectiveness of the DRP will ultimately depend upon the extent to which its recommendations are genuinely reflected within the final detailed design. ECC would also refer to its response to ExQ1 question DES 1.3 from [REP3-078], including the need for the project to undergo independent design review, and the need for this to be secured appropriately through the DCO. Overall, the Council welcomes the proposed DRP arrangements as a positive addition but remains cautious as to whether this mechanism will deliver on the outcomes being sought by the County Council. The Council has no further additional substantive comments on the DRP proposals other than those previously raised within ECC submissions.	project team. The Applicant emphasises that the effectiveness of a Design Champion does not depend on separation from the Project, but on their ability to provide objective challenge throughout the design process. The Design Development Champion has been selected specifically because of their extensive knowledge of the Project, the design development process and the established design principles. This enables the Design Development Champion to act as an informed and effective critical friend, providing challenge where necessary whilst ensuring that the Project's design principles (climate, people, place and value) remain embedded within the Project and continue to be applied through the detailed design stage. The Applicant therefore considers that the Design Development Champion's detailed understanding of the Project enhances, rather than diminishes, their ability to provide effective challenge and promote good design outcomes. In addition, and to provide a further layer of design governance during later stages of the Project, a Delivery and Detail Design Champion will be appointed from the Arup-AECOM Joint Venture (AAJV) acting under the Design, Consenting and Environmental Partner of the GGP. Together, the Design Development Champion and the Delivery and Detail Design Champion provide complementary Design Champion functions throughout the Project lifecycle, with continuity of design intent and delivery of good design maintained through a structured transfer of knowledge and oversight between project stages. The Applicant notes the concerns regarding the advisory nature of the Design Review Panel and the role of the Design Executive in making final detailed design decisions. The Applicant emphasises that this arrangement is consistent with the role typically undertaken by fully independent design review panels, whose purpose is to provide scrutiny, expert advice and design challenge rather than to act as the decision-maker. Responsibility for detailed design decisions must ultimately remain with the body accountable for the delivery of the Project and compliance with operational, engineering, safety and security requirements. The Applicant further stresses that the effectiveness of the DRP should not be measured by whether it possesses decision-making powers, but by the extent to which its recommendations are formally considered and responded to through the design governance process. As secured through 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373], the Design

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					Executive will be required to have regard to and respond to the recommendations of the DRP, identifying which recommendations have been adopted and, where recommendations are not taken forward, setting out the reasons for that decision. This process will be overseen by the Delivery and Detail Design Champion, who will work with the Design Executive to support the implementation, where reasonable and practicable, of the recommendations of the DRP and the advice contained within the Design Review Panel Report. Furthermore, the design review process comprises a two-stage review. The Design Executive will utilise the second review meeting to provide feedback directly to the Design Review Panel on the recommendations arising from the first review, enabling a transparent discussion regarding how those recommendations have influenced the developing design. This provides a clear and auditable mechanism through which the DRP can influence detailed design outcomes whilst ensuring that final decisions remain with the Design Executive, consistent with the design governance arrangements. The Applicant also notes Essex County Council's comments regarding the need for appropriate provision to be secured through the DCO. Commitments relating to the composition and operation of the DRP, including representation from external participants and local authority representatives where appropriate, are secured through 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] as a certified document under Schedule 19 of 3.1 Draft DCO [Revision H]. The Final LEMP submitted for approval under Requirement 4 of 3.1 Draft DCO [Revision H] will include a statement demonstrating: • How regard has been had to the relevant DASSI design principles during the development of the detailed design • How recommendations arising from the Design Review process have been taken into account, where appropriate, in the final details submitted for approval. The Applicant therefore considers that 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373], 7.4 Outline Landscape and Ecological Management Plan [REP7-342] (where the Final LEMP requires discharge under Requirement 4) and Requirement 12 together provide the most appropriate

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					mechanism through which to address the matters related to design governance. In submitting details of development in accordance with Requirement 12(5) and (6), the Applicant will provide the Design Review Panel Report together with feedback from the Design Executive setting out how it has had regard to the Panel's recommendations. This provides a clear and auditable mechanism demonstrating how DRP recommendations have been considered and incorporated, where appropriate, into the detailed design process at the discharge of requirements stage.
			South Norfolk District Council [REP7-571]	SNDC having reviewed the DAS and DASSI note that this is primarily aimed at the substations and permanent buildings which do not fall within South Norfolk and therefore we have no comments to make other than the provisions should be specific to which Local Authorities would be involved.	Noted.
			Norfolk County Council [REP7-564]	NCC consider a DRP process to be good practice, albeit usually at a more formative stage of project development. We do not have any more specific comments to make about good design.	Noted.
			Thurrock Council [REP7-575]	8.1 Given the potential issues with delivering BNG over such a large scheme covering a long thin area we welcome the inclusion of a specific BNG lead on the Design Review Panel (DRP). 8.2 The Council believes it is key for the local planning authorities to be involved in the DRP and while not needed in this document discussions on the following point would be appreciated. • Who determines where relevant • Ability for LPA to bring along multiple specialists to cover disciplines • Anticipated frequency and notice of meetings 8.3 The Council acknowledges that the DRP does not have decision making powers and will just provide advice. The Council requests clarification as to whether the reports prepared and the GGP Design Executive, setting out their responses to the DRP's comments, will be made available to stakeholders. If so, the Council further requests confirmation that stakeholders will be given an opportunity to comment on those responses.	8.1 Noted 8.2 Prior to the commencement of the formal design reviews, the Applicant will hold an introductory workshop following the close of the Examination to provide local authorities and other external participants with further details on the design review process, governance arrangements and review protocols (including the terms of reference). This workshop will also incorporate the presentation on link pillars discussed at Issue Specific Hearing 4 on 25 June 2026 and will provide an opportunity to discuss the proposed structure, operation and membership of the Design Review Panel (DRP). The Applicant envisages the DRP will include attendees tailored to the specific design matters under consideration. Whilst the DRP is referred to as a single panel within 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373], the participants involved in any particular review will vary depending on the geographic area and design component being considered. For example, individual reviews may focus on substations, link pillars, Environmental Areas or cable sealing end compounds and membership will be tailored accordingly to ensure that the appropriate expertise is available. In relation to determining what is "relevant", the Applicant's intention is that participation will be

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					proportionate to the matters being reviewed. For example, a review relating solely to Tilbury North Substation would not ordinarily require attendance from authorities or stakeholders whose interests relate to Norfolk or Suffolk. Similarly, specialist attendees would be invited where their expertise is relevant to the design topic under consideration. The Applicant would have no objection in principle to local planning authorities being represented by more than one officer where this would assist the review of a particular design matter. The Applicant recognises that different disciplines may require different specialist input. It is therefore envisaged that authorities will be able to nominate those representatives they consider most appropriate for the matters being discussed, with attendee numbers managed pragmatically to ensure that reviews remain effective and focused. The Applicant anticipates that Design Review Panels will generally be convened around key Design Control Points established through the DASSI. Where there is a clear relationship between different assets or design matters, reviews may be grouped together to promote efficiency and ensure a holistic consideration of design issues. It is currently envisaged that there could be up to three DRP groupings at each Design Control Point, allowing reviews to remain manageable whilst ensuring appropriate scrutiny of the relevant design proposals. Meeting frequency will therefore be driven by the design programme and the progression of detailed design, rather than a fixed timetable. The Applicant's intention is to provide participants with reasonable advance notice of meetings together with sufficient information to enable informed review and meaningful participation. The Applicant would emphasise that the DRP forms part of a broader design governance framework secured through the DASSI. Local authority and external stakeholder input is an important component of that framework, and the introductory workshop will provide an opportunity to agree the practical arrangements for participation, panel composition and review procedures before the commencement of formal design reviews. 8.3 As set out within the DASSI, the Design Executive will be required to have regard to and respond to the recommendations of the DRP, identifying which recommendations have been adopted and, where recommendations are not taken forward, setting out the reasons for that decision. The design review process also incorporates a two-stage review, whereby the Design

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					Executive will utilise the second review meeting to provide feedback directly to the DRP on the recommendations arising from the first review, enabling a transparent discussion regarding how those recommendations have influenced the developing design. In addition, when submitting details of development pursuant to Requirement 12(5) and (6), the Applicant will provide the Design Review Panel Report together with feedback from the Design Executive setting out how regard has been had to the Panel's recommendations. This provides a clear and auditable mechanism demonstrating how DRP recommendations have been considered and incorporated, where appropriate, into the detailed design process. The Applicant also notes that the Final Landscape and Ecological Management Plan (LEMP), submitted for approval under Requirement 4, will include a statement demonstrating how regard has been had to the relevant DASSI design principles and how recommendations arising from the design review process have been taken into account, where appropriate, in the final details submitted for approval. The Applicant therefore considers that 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373], 7.4 Outline Landscape and Ecological Management Plan [REP7-342] and Requirement 12 in 3.1 Draft DCO [Revision H] together provide a robust and transparent framework for recording, reporting and evidencing the consideration of DRP recommendations throughout the detailed design process. The opportunity for stakeholders to comment on submissions made pursuant to the requirements of the Development Consent Order will be determined in accordance with the relevant discharge of requirements process and the procedures of the relevant discharging authority.
			Brentwood Borough Council [REP7-546]	BBC recognises that references in the Design and Access Statement (DAS) [REP6-090] to NPS EN-1 set out that there may be limited opportunities to amend the physical appearance of some energy infrastructure and in NPS EN-5 that electricity networks infrastructure must in the first instance be safe and secure, but these are balanced against NPS EN-1 setting out that applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. As the local authority responsible for all	The Applicant envisages the DRP will include attendees tailored to the specific design matters under consideration. Whilst the DRP is referred to as a single panel within 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] , the participants involved in any particular review will vary depending on the geographic area and design component being considered. For example, individual reviews may focus on substations, link pillars, Environmental Areas or cable sealing end compounds and membership will be tailored accordingly to ensure that the appropriate expertise is available.

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				development in its geographical area and with a detailed understanding of what is appropriate and sensitive to place, BBC seeks to secure similarly optimum design outcomes for all development types at all scales and therefore considers it has considerable expertise and track record of delivering this. In this context, BBC has reviewed the Design Review Panel (DRP) proposals contained within the Design and Access Statement (REP6-090) and welcomes the detail provided regarding the proposed governance arrangements, membership, scope and review stages, but in particular supports the inclusion of local planning authorities and other relevant stakeholders within the review process. BBC remains concerned, however, on the phrasing of Para 5.6.48 on the inclusion of local authorities on the panel 'where relevant' and would seek further clarity on this. Should this be a geographical reference, then it should be clearly set out. If it is relevance to the panel in any other sense, then BBC is of the view that local authority officers with detailed design expertise built up over many years will always be relevant to a panel determining design matters for their authority area. Clarity on this would be helpful. BBC has further concerns that the DAS refers to this as a GGP-led DRP, that the Design Development Champion is also a "senior figure from National Grid", and that the Design Executive is the design team at the delivery stage. This raises an issue as to the impartiality of the design processes around the project; for a design review process to be robust, the panel should be properly independent, balancing the need for functionality and security, whilst delivering the best local design and environmental outcomes for the project. In addition to this, BBC also notes that the DRP is advisory in nature and that responsibility for final design decisions remains with the Design Executive, but any genuine effectiveness of a DRP will ultimately depend upon the extent to which its recommendations can properly be reflected in the final detailed design. Whilst BBC welcomes the proposed DRP arrangements as a positive addition, it remains concerned as to whether this mechanism as currently proposed will deliver on the outcomes being sought. BBC therefore considers that further clarity on DRP involvement and potential for influence on design outcomes would be helpful.	In relation to determining what is "relevant", the Applicant's intention is that participation will be proportionate to the matters being reviewed. For example, a review relating solely to Tilbury North Substation would not ordinarily require attendance from authorities or stakeholders whose interests relate to Norfolk or Suffolk. Similarly, specialist attendees would be invited where their expertise is relevant to the design topic under consideration. The Applicant notes the concern regarding the appointment of a senior figure within National Grid as the Design Development Champion. The Applicant has intentionally selected the Design Development Champion from within the existing project team due to their significant experience and detailed knowledge of the Project's development to date. Notably, the Design Development Champion is separate from the Great Grid Partnership (GGP). The Applicant has onboarded the Great Grid Partnership in a design review capacity separate to the internal National Grid project team. The GGP provides an additional layer of design governance, technical assurance and design review, providing a degree of separation, or "informed independence", from the internal project team. The Applicant emphasises that the effectiveness of a Design Champion does not depend on separation from the Project, but on their ability to provide objective challenge throughout the design process. The Design Development Champion has been selected specifically because of their extensive knowledge of the Project, the design development process and the established design principles. This enables the Design Development Champion to act as an informed and effective critical friend, providing challenge where necessary whilst ensuring that the Project's design principles (climate, people, place and value) remain embedded within the Project and continue to be applied through the detailed design stage. The Applicant therefore considers that the Design Development Champion's detailed understanding of the Project enhances, rather than diminishes, their ability to provide effective challenge and promote good design outcomes. In addition, and to provide a further layer of design governance during later stages of the Project, a Delivery and Detail Design Champion will be appointed from the Arup-AECOM Joint Venture (AAJV) acting under the Design, Consenting and Environmental Partner of the GGP. Together, the Design Development Champion and the Delivery and Detail Design Champion provide

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					complementary Design Champion functions throughout the Project lifecycle, with continuity of design intent and delivery of good design maintained through a structured transfer of knowledge and oversight between project stages. The Applicant notes the concerns regarding the advisory nature of the Design Review Panel and the role of the Design Executive in making final detailed design decisions. The Applicant emphasises that this arrangement is consistent with the role typically undertaken by fully independent design review panels, whose purpose is to provide scrutiny, expert advice and design challenge rather than to act as the decision-maker. Responsibility for detailed design decisions must ultimately remain with the body accountable for the delivery of the Project and compliance with operational, engineering, safety and security requirements. The Applicant further stresses that the effectiveness of the DRP should not be measured by whether it possesses decision-making powers, but by the extent to which its recommendations are formally considered and responded to through the design governance process. As secured through the DASSI, the Design Executive will be required to have regard to and respond to the recommendations of the DRP, identifying which recommendations have been adopted and, where recommendations are not taken forward, setting out the reasons for that decision. This process will be overseen by the Delivery and Detail Design Champion, who will work with the Design Executive to support the implementation, where reasonable and practicable, of the recommendations of the DRP and the advice contained within the Design Review Panel Report. Furthermore, the design review process comprises a two-stage review. The Design Executive will utilise the second review meeting to provide feedback directly to the Design Review Panel on the recommendations arising from the first review, enabling a transparent discussion regarding how those recommendations have influenced the developing design. This provides a clear and auditable mechanism through which the DRP can influence detailed design outcomes whilst ensuring that final decisions remain with the Design Executive, consistent with the design governance arrangements. The Applicant also notes Essex County Council's comments regarding the need for appropriate provision to be secured through the DCO. Commitments relating to the composition and operation of the DRP, including representation from external participants and local authority representatives where appropriate, are secured

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					through 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373] as a certified document under Schedule 19 of 3.1 Draft DCO [Revision H]. The Final LEMP submitted for approval under Requirement 4 of 3.1 Draft DCO [Revision H] will include a statement demonstrating: • How regard has been had to the relevant DASSI design principles during the development of the detailed design • How recommendations arising from the Design Review process have been taken into account, where appropriate, in the final details submitted for approval. The Applicant therefore considers that 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP7-373], 7.4 Outline Landscape and Ecological Management Plan [REP7-342] (where the Final LEMP requires discharge under Requirement 4) and Requirement 12 in 3.1 Draft DCO [Revision H] together provide the most appropriate mechanism through which to address the matters related to design governance. In submitting details of development in accordance with Requirement 12(5) and (6), the Applicant will provide the Design Review Panel Report together with feedback from the Design Executive setting out how it has had regard to the Panel's recommendations. This provides a clear and auditable mechanism demonstrating how DRP recommendations have been considered and incorporated, where appropriate, into the detailed design process at the discharge of requirements stage.
			Colchester City Council [REP7-549]	CCC consider good design to be fundamental to good planning and would rather have seen a significant greater level of detail pertaining to design matters upfront, particularly when they sit close to or within the Dedham Vale National Landscape. With regards to the DRP proposal CCC have discussed this with ECC and will defer to them on this matter.	The Applicant notes this feedback and would like to note that significant time was dedicated to the development of a well-designed project that minimises adverse impacts and maximises benefits as far as possible. The extensive optioneering and back checking process undertaken in the development of the project has resulted in a holistic, multi-disciplinary approach to project development, with the lowest impact sites and routes identified and embedded into the project. The project has frequently evolved in response to consultation responses and to minimise impacts where further evidence has indicated the benefits of doing so.
6.6	Applicant	Offsite planting The outline Offsite Planting Delivery Scheme (OPDS) [REP6-128] includes a section on management and maintenance. Separately the	Essex County Council [REP7-553]	This question is not directed at the Local Authorities. However, as the 3:1 replacement planting scheme has been moved from a proposed legal agreement to updating requirement 9, alongside the Outline Offsite Planting	The Applicant notes the Council's comments. 8.28 Outline Offsite Planting Delivery Scheme [Revision B] includes in paragraph 2.3.9 that locations for tree replacement planting will be considered having regard to the '<i>proximity to the Order Limits and seeking to achieve a</i>

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		outline LEMP [REP6-084] has been updated to include a number of adaptive aftercare measures. a) The outline LEMP refers to the outline OPDS but do the documents need to be more interlinked? b) Do the adaptive aftercare measures within the outline LEMP also need to be included in the outline OPDS? If not, please explain why not.	Endorsed/replicated by Braintree District Council [REP7-545]	Delivery Scheme, the Council wish to take this opportunity to comment. The Council welcomes the Applicant's commitment to provide replacement tree planting at a ratio of 3:1 and acknowledges that the Outline Offsite Planting Delivery Scheme (OPDS) establishes a broadly reasonable framework for delivering replacement planting where the required mitigation cannot be accommodated within the Order Limits. The Council also notes that the document generally accords with recognised arboricultural good practices. The Council supports the Applicant's intention to prioritise replacement planting within the Order Limits before considering off-site provision and welcomes the inclusion of site selection criteria which seek to promote landscape, biodiversity and green infrastructure benefits. The Council also notes the Applicant's commitment to align replacement planting opportunities with relevant Local Nature Recovery Strategies and wider landscape objectives. It would however welcome a stronger commitment as part of its sequential approach, to prioritising replacement planting within the Parish Council boundaries of the host communities affected by the proposal before considering alternatives more distant from the project. Notwithstanding the above, the Council has reservations regarding the operation of the revised Requirement 9 and the level of oversight afforded to the relevant planning authority. Whilst Requirement 9(1) requires approval of the reinstatement planting plan, the off-site planting delivery scheme is only required to be submitted to the relevant planning authority and is not subject to approval. As currently drafted, the relevant planning authority would have limited ability to review or influence the proposed off-site planting arrangements before the relevant stage is brought into operation. The Council notes that the OPDS confirms that the final quantum of replacement planting, the amount capable of being accommodated within the Order Limits and the resulting off-site planting requirement will only be known following detailed design and discharge of Requirements 8 and 9. The Council considers that, once these details are known, there should be an opportunity for the relevant planning authority to review and approve the proposed off-site planting arrangements, including the proposed locations, delivery mechanism, species selection, planting specification and implementation programme. The Council is also concerned that whilst the OPDS identifies broad planting principles and site selection	<i>distribution across the areas affected by the Project</i>. It is considered this achieves the same outcome by prioritising the Order Limits, then considering land close to the Order Limits which would include the parish boundaries. In relation to the comment on the lack of approval mechanism, Requirement 9 was updated at Deadline 7 in 3.1 Draft DCO [Revision H] to require the Offsite Planting Delivery Scheme to be submitted to and approved by the relevant local planning authorities. In relation to species suitability and deliverability, 8.28 Outline Offsite Planting Delivery Scheme [Revision B] has been updated at Deadline 8 to address these points. In relation to the aftercare period for any offsite planting, the Applicant maintains the same position regarding the adequacy of the five-year period as set out in no. 5.1d 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 detailed within 8.31 Applicant's Closing Statement and a Summary of Areas of Disagreement.

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				criteria, it does not establish clear parameters regarding species suitability, climate resilience, resistance to pests and diseases, or implementation timescales beyond requiring proposed timings to be identified at a later stage. The Council considers that these matters are important to ensuring that replacement planting delivers a resilient and successful long-term outcome. The Council also notes that the OPDS relies upon a five-year aftercare period and that the Applicant will only use "reasonable endeavours" to secure appropriate establishment, management and maintenance arrangements for replacement planting. Whilst the Council acknowledges that a five-year establishment period is supported by recognised arboricultural guidance, it considers that the document should provide greater certainty regarding the long-term management and maintenance of replacement planting, particularly where planting is delivered through third-party organisations, funding mechanisms or voluntary agreements with landowners. The Council would also welcome clearer alignment between the aftercare provisions contained within the OPDS and the adaptive aftercare approach now incorporated within the Outline Landscape and Ecological Management Plan. The Council therefore considers that the principle of the OPDS is acceptable. However, additional controls are required to ensure that the relevant planning authority has an appropriate role in reviewing and approving the final off-site planting proposals and confirming that the replacement planting commitment is delivered in a manner consistent with the objectives of the OPDS."	

2.7 Safety and security (aviation safety)

Table 2.6 Applicant’s comments on Rule 17 matters relating to security and safety

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7.2	Defence Infrastructure Organisation	Wattisham Station The applicant confirms at deadline 6 [REP6-118] that agreement has been virtually met concerning effects on Wattisham Station, with outstanding matters solely relating to the exact wording of requirements	Defence Infrastructure Organisation [REP7-551]	The Written Representations provided by DIO on behalf of the MOD dated 26 February 2026 identified that further assessments needed to be completed with regard to the impact of this development on Wattisham Station based on further information provided by the Applicant on 19 February 2026. DIO provided a further update dated 10 April 2026 on these assessments in response to the	The Applicant was pleased to receive the Ministry of Defence’s letter of 20 July 2026, which confirmed the withdrawal of their statutory safeguarding objection to the Project (see Defence Infrastructure Organisation comments on any further information/submissions received by Deadline 6 [REP7-550]). This followed close collaboration between the Applicant and the MOD to

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		within the draft DCO [REP6-030]. Please provide an update and confirm (or otherwise) your agreement with the applicant.		Examining Authority's Written Questions 1, which were issued on 20 March 2026, identifying that detailed assessments of the effects of vertical and lateral Limits of Deviation (LoD) and deployment of craneage upon Wattisham Station were being finalized. Since April 2026 DIO and the Applicant have engaged in regular discussions which have enabled the MOD to provide a letter to the Examining Authority on 20 July 2026 that advises of the updated statutory safeguarding position of the MOD to this proposed development subject to the incorporation of appropriately worded Requirements and an additional paragraph into the applicant's draft Development Consent Order. In line with the content of the 20 July 2026 MOD updated statutory safeguarding letter referenced above I can confirm that the MOD concurs with the applicant's position as stated at 7.2 of the Examining Authority's Rule 17 Letter dated 14 July 2026.	ensure the agreement of appropriate mitigation of assessed Project impacts on defence interests including, but not limited to, Wattisham Station military aerodrome. The agreed provisions to secure the Applicant's commitments were included within 3.1 Draft DCO [Revision H] as drafted and described within Annex A, B and C of the 20 July 2026 letter (see Defence Infrastructure Organisation comments on any further information/submissions received by Deadline 6 [REP7-550]). 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 MOD.

2.8 Socio-economics, Recreation and Tourism

Table 2.7 Applicant's comments on Rule 17 matters relating to socioeconomics

Rule 17 Question	Directed to	Question	Name / Examination Library ID	Response	Applicant Comment
8.1	Applicant	Employment and Skills Plan Essex CC [REP6-147] and Suffolk CC [REP6-165] raise concerns regarding the ESP. For example, the outline ESP lacks sufficient detail, certainty, governance or evidence to demonstrate that workforce, skills and employment impacts have been fully understood or will be effectively managed, the matter of supply chains and inadequate consideration of the context of the scale, complexity and cumulative nature of demand arising from multiple projects across Norfolk, Suffolk and Essex. The ExA is concerned at the lack of focus from the applicant on socio-economics matters, and is not satisfied in regard to the concerns raised in local impact reports (Essex CC [REP1-161] and Suffolk CC	Suffolk County Council [REP7-572]	SCC welcomes the Examining Authority's recognition of the concerns raised by local authorities in relation to the Outline Employment and Skills Plan ("OESP") and agrees that these matters remain unresolved. Having reviewed the Applicant's submissions to date, SCC remains concerned that the OESP does not provide a sufficiently robust, integrated or evidence-led framework to demonstrate that workforce, skills and supply chain impacts have been fully understood or can be effectively managed. While SCC acknowledges that additional detail may appropriately be developed through a Final Employment and Skills Plan ("FESP"), the Applicant continues to defer key elements of workforce profiling, skills demand analysis, supply chain planning, governance arrangements, targets and monitoring frameworks to the post-consent stage. In SCC's view, this limits the ability to understand the scale and nature of workforce demand arising from the Project and, in turn, restricts the ability to assess the significance of socio-economic effects and determine whether appropriate evidence-led mitigation and management measures can be identified and secured at the pre-consent stage.	Please see the 8.31 Response to Rule 17 Letter Received 14 July 2026 [REP7-533] Section 8, Reference 8.1. In summary, the Applicant considers that it has adequately addressed socio-economic effects within 6.15 Environmental Statement Chapter 15 - Socio-Economics, Recreation and Tourism [REP7-296]. 8.13 Outline Employment and Skills Plan [REP7-489] is not intended to be a mitigation document. It is an outline, benefit-led document which establishes the framework, governance arrangements and commitments that will guide the development of the Final ESP. Paragraph 6.4.2 of 8.13 Outline Employment and Skills Plan [REP7-489] outlines how the Applicant proposes to work with the RSCF.

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		[REP1-178]) relating to ESPs. Indeed Suffolk CC advises it “...remains concerned that the absence of this evidence limits the ability to understand the scale and nature of workforce demand arising from the Project and, in turn, restricts the ability to assess the significance of socio-economic effects and determine whether appropriate evidence-led mitigation can be identified and secured at the pre-consent stage, consistent with the expectations of NPS EN-1.” The applicant should revisit its outline ESP with a view to ensuring it adequately addresses the concerns raised, including utilising established mechanisms such as that referenced by Suffolk CC (ie the Regional Skills Coordination Function). Should the applicant choose not to amend the outline ESP, it should provide a full and reasoned justification as to how it considers the evidence submitted to date provides adequate evidence to enable the ExA to understand the scale and nature of workforce demand arising from the proposed development. In doing so, the applicant should provide evidence that adequately assesses the significance of socio-economic effects and that clearly defines appropriate evidence-led mitigation that has been or can be identified and secured at the pre-consent stage. The applicant should demonstrate this is consistent with the expectations of NPS EN-1.		SCC also remains concerned that the Applicant has not provided sufficient evidence regarding cumulative labour market and supply chain pressures. Whilst the OESP acknowledges the presence of multiple NSIPs and existing skills constraints across Norfolk, Suffolk and Essex, it does not include a quantified assessment of overlapping workforce demand, supply chain competition, labour displacement or associated risks to labour market resilience. Nor does it adequately demonstrate how these matters will be coordinated with other infrastructure projects. SCC continues to consider that these issues are particularly important given the concentration of major infrastructure projects within the region and the competition for many of the same skills and supply chain resources. SCC welcomes the references within the OESP to stakeholder engagement and the Regional Skills Coordination Function ("RSCF"). However, 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 workforce pressures across Suffolk and the wider region. SCC remains of the view that a stronger and more explicit commitment to engagement through the RSCF is required, supported by structured data sharing, ongoing governance and collaborative workforce planning. SCC also maintains that workforce demand, skills provision and supply chain participation should be considered as components of an integrated system. The OESP does not yet demonstrate how forecast workforce demand translates into specific skills requirements, how those requirements will be addressed through targeted interventions, or how this in turn will support local and regional supply chain participation. In the absence of this clear line of sight, SCC remains concerned that it is not possible to determine whether the proposed approach is proportionate, deliverable or sufficient to address identified labour market constraints. Accordingly, SCC continues to support the Examining Authority's request that the Applicant either strengthen the OESP to address these matters, including through clearer integration with the RSCF and a more robust workforce and supply chain evidence base, or provide fuller justification as to how the evidence currently submitted is sufficient to understand workforce demand, assess socio-economic effects and identify appropriate evidence-led mitigation and management measures consistent with the expectations of NPS EN-1.	

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				SCC's position remains that, until these matters are addressed, there is insufficient certainty that the Final ESP can function as an effective mechanism for managing workforce, skills and supply chain impacts arising from the Project and maximising local and regional employment outcomes.	

2.9 Water environment: flood risk, hydrology and drainage

2.9.1 No third party responses to questions on this topic were received at Deadline 7.

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