

The Secretary of State  
c/o The Planning Inspectorate  
Temple Quay House  
2, The Square  
Bristol, BS1 6PN

For the attention of: Andrew Mahon (Lead Member of the Examining Authority)  
(c/o Jake Stephens (Case Manager))

22 August 2023

By email only to: [bramfordtotwinstead@planninginspectorate.gov.uk](mailto:bramfordtotwinstead@planninginspectorate.gov.uk)

Our Reference: Document 8.2  
Your Reference: EN020002

Dear Andrew Mahon,

**Planning Act 2008 (as amended)**

**Application by National Grid Electricity Transmission Plc (National Grid) for an Order granting Development Consent for the Bramford to Twinstead Reinforcement (the Project)**

**Applicant's Response to the Rule 6 Letter dated 7 August 2023**

This letter constitutes National Grid's (**the Applicant**) response to the Examining Authority's (**ExA**) Rule 6 Letter dated 7 August 2023 (**the Rule 6 Letter**) and is submitted at **Procedural Deadline A** (22 August 2023).

- 1 Requests to be heard orally at, and to participate in, the Preliminary Meeting, Open Floor Hearings 1 & 2 and Issue Specific Hearing 1**
  - 1.1 The Applicant confirms its intention to attend, and to participate in, each of the following hearings:
    - 1.1.1 Preliminary Meeting at 10.00am on 12 September 2023;
    - 1.1.2 Open Floor Hearing 1 at 2.00pm on 12 September 2023;
    - 1.1.3 Open Floor Hearing 2 at 6.30pm on 13 September 2023; and
    - 1.1.4 Issue Specific Hearing 1 at 10.00am on 14 September 2023.
  - 1.2 The Applicant confirms that it will be in attendance at the venues identified in the Rule 6 Letter for each of the above hearings.
  - 1.3 The Applicant anticipates that it will address the ExA on all Items as set out in the Agenda for the Preliminary Meeting included at Annex A of the Rule 6 Letter.
  - 1.4 The Applicant's submissions on Items 3 (*Initial Assessment of Principal Issues*), 4 (*Draft Examination Timetable*), 5 (*Hearings and Accompanied Site Inspections*), 6 (*Procedural Decisions*) and 7 (*Any other matters*) are also set out in Paragraphs 3 – 7 (respectively) of this letter.
  - 1.5 The Applicant also anticipates that the ExA will wish to allow the fullest use of the Open Floor Hearings to hear from members of the public and other Interested Parties. Accordingly, the Applicant does not anticipate needing to respond in detail to submissions made at the Open Floor Hearings nor to provide any detailed statement at the Open Floor Hearings.

1.6 The Applicant proposes instead to provide written responses, where appropriate and if requested, to the representations made at the Open Floor Hearings. The Applicant otherwise intends to restrict its oral contributions to points of clarification, as and when those would assist the ExA.

## **2 Written Submissions on the Examination procedure**

2.1 The Applicant wishes to make the following statements regarding the Examination procedure:

2.1.1 The Applicant requests that detailed agendas for all Issue Specific Hearings and Compulsory Acquisition Hearings are issued at least ten working days in advance in order to allow all parties sufficient time to prepare for the same. This will help ensure that the ExA is provided with thorough information during the course of those hearings.

2.1.2 The Applicant notes the possibility of further hearings being held during the week commencing 11 December 2023. Given the proximity of those hearings to the Christmas and New Year period, and the likelihood of suitable hearing venues therefore being in high demand for other festive purposes, the Applicant would welcome early clarification from the ExA as to the most likely administrative requirements for those hearings so that appropriate arrangements can be put in place by the Applicant on a pre-emptive basis at the earliest opportunity.

2.1.3 The Applicant further notes that the ExA anticipates that hearings for this Examination will be blended, meaning that participation can be both in-person and virtual. The Applicant has no in principle objection to the use of blended or virtual events.

2.1.4 The Applicant requests that, following its response due at Deadline 8 (currently 9 February 2024) to the ExA's commentary on, or schedule of changes to, the draft Development Consent Order (due to be issued on 19 January 2024), the ExA provides a further written update or commentary on any outstanding matters relating to the draft Development Consent Order. This would provide the Applicant with an opportunity to address any additional drafting amendments ahead of submitting a final draft of the Development Consent Order at Deadline 9 (currently 23 February 2023).

## **3 Principal Issues (*Preliminary Meeting Agenda Item 3*)**

3.1 The Applicant has no comments on the ExA's Initial Assessment of Principal Issues as set out in Annex C of the Rule 6 Letter.

3.2 In order to facilitate the ExA's consideration of the principal issues as currently identified, the Applicant includes at **Appendix 1** to this letter a schedule of the principal issues and a signpost reference to where those issues are primarily dealt with in the application documents.

## **4 Written Submissions on the draft Examination Timetable (*Preliminary Meeting Agenda Item 4*)**

4.1 The Applicant wishes to make the following submissions regarding the draft Examination Timetable included at Annex D of the Rule 6 Letter:

### **4.1.1 Written Questions:**

(a) The time permitted for the Applicant (and other parties) to respond to both the First Written Questions and the Second Written Questions is particularly limited. First Written Questions are expected to be published on 13 October 2023, with responses due by Deadline 3 (27 October 2023). Second Written Questions are expected to be published on 22 December 2023, with responses due by Deadline 7 (15 January 2024).

(b) The Applicant notes that both response periods are markedly shorter than those permitted in the context of other comparable ongoing Examinations and, in the case of the Second Written Questions, the capacity of all parties to respond effectively is likely to be further

constrained by the Christmas and New Year period (which includes three Bank Holiday dates). The Applicant considers that the current response periods will inhibit the ability of all parties to engage effectively in the Examination process, particularly where collaboration or further engagement is necessary in order to inform one or more written responses. As a consequence, the quality and comprehensiveness of written submissions is likely to be materially impacted.

- (c) The Applicant further notes that responses to First Written Questions are due at Deadline 3 (27 October 2023) alongside responses to Written Representations and a significant number of other documentary submissions.
- (d) In light of the above, the Applicant requests that the time permitted for responding to First and Second Written Questions should be increased by at least two weeks and one week respectively. This would allow sufficient opportunity to properly respond to what are anticipated to be a greater number of First Written Questions, and also alleviate resourcing and other pressures on all parties during the festive period.

**The Applicant would therefore request that:**

- (i) **Responses to First Written Questions are provided by Deadline 4 (16 November 2023);**
- (ii) **Comments on responses to First Written Questions are provided by Deadline 5 (1 December 2023);**
- (iii) **Second Written Questions are published as currently programmed on 22 December 2023; and**
- (iv) **Responses to Second Written Questions are provided by a new Deadline 7(A) (22 January 2024).**

#### 4.1.2 **Local Impact Reports:**

- (a) The Applicant notes that comments on Local Impact Reports are currently required to be submitted at Deadline 2 (11 October 2023).
- (b) In the Applicant's opinion, those Local Impact Reports will be very closely aligned with the Written Representations which it is anticipated that the relevant local authorities will wish to submit at Deadline 2.
- (c) In light of the above, the Applicant would request that the time permitted for responding to Local Impact Reports be increased by at least two weeks beyond the current Deadline 2.

**The Applicant would therefore request that comments on Local Impact Reports be provided by Deadline 3 (27 October 2023).**

#### 4.1.3 **Protective Provisions:**

- (a) The Applicant notes that final agreed Protective Provisions are currently required to be submitted at Deadline 5 (1 December 2023).
- (b) Whilst the current draft Development Consent Order [**APP-034**] contains the Applicant's proposed form of Protective Provisions, the Applicant could anticipate a situation whereby further changes are required to be made to the Protective Provisions in the period following Deadline 5 in order to take full account of any concurrent commercial negotiations with

affected statutory undertakers (indeed the draft Examination Timetable envisages such negotiations being concluded by Deadline 9 (23 February 2024)).

- (c) The Applicant would intend to keep the ExA fully apprised of progress in this respect.

#### 4.1.4 **Publication of Documents:**

- (a) Whilst the Applicant recognises that the ExA will publish the submissions from each deadline and/or written questions as soon as possible, in view of the very short timeframes between certain deadlines, it will be essential for the Applicant to have sight of these documents swiftly following the timetabled deadline in order to meet the subsequent deadline.

### **5 Accompanied Site Inspections (*Preliminary Meeting Agenda Item 5*)**

5.1 The Applicant notes Procedural Decision 3 (**PD3**) at Annex F of the Rule 6 Letter, and confirms that a draft itinerary for a potential Accompanied Site Inspection will be submitted by Deadline 1 (currently 25 September 2023).

5.2 The Applicant will, of course, have regard to all other submissions made at Procedural Deadline A in response to PD3 when preparing a draft itinerary.

### **6 Written Submissions on other Procedural Decisions (*Preliminary Meeting Agenda Item 6*)**

#### **6.1 Procedural Decision 1 (Statements of Common Ground (SoCG))**

6.1.1 The Applicant notes the content of Procedural Decision 1 (**PD1**) at Annex F of the Rule 6 Letter which, in part, requests the Applicant to clarify its intentions regarding the possible need for SoCGs with each of Essex Police (and other affected emergency services) and the relevant Parish Councils.

6.1.2 In response:

- (a) The Applicant confirms its intention is to engage with Essex Police (and other affected emergency services) with a view to determining whether or not an SoCG is necessary and proportionate in each case. As matters currently stand, and having had particular regard to the Relevant Representation made by Essex Police [RR-033], the Applicant does not anticipate that further SoCGs will be necessary.
- (b) The Applicant does not consider that there is a need for additional SoCGs with any of the relevant Parish Councils in the context where there is a draft SoCG which is proposed jointly with each of the democratically elected host local authorities [**APP-168**] (and indeed none of the Parish Councils have asked for SoCGs in their Relevant Representations). The Applicant would also note that the relevant Parish Councils will each have further opportunities to provide written and oral submissions during the course of the Examination, and the Applicant would intend to have due regard to any such representations, and respond where appropriate, in the usual way.

#### **6.2 Procedural Decision 11 (Section 51 Advice)**

6.2.1 The Applicant notes the content of Procedural Decision 11 (**PD11**) at Annex F of the Rule 6 Letter regarding the Section 51 Advice issued by the Planning Inspectorate on 23 May 2023 (**the Section 51 Advice**), and the Applicant's subsequent response to the same of 3 July 2023 [**AS-004**].

6.2.2 Notwithstanding the content of PD11, the Applicant wishes to respond to the following request set out on page 2 of the Section 51 Advice (under the sub-heading 'Plans'):

*“It would be helpful if the Applicant could review all plans and resubmit in response to the s51 advice issued following Acceptance....”*

6.2.3 The Applicant has now undertaken a review of all plans submitted with the application and has identified the following two instances where the legend shown on the submitted plans was distorted when downloaded and viewed in certain PDF software. (The substantive visual content of the plans in each case was not affected and has not been amended):

- (a) **5.8 Photomontages [APP-062]**: the text included in the legend on the Photomontage Viewpoint Location Plan; and
- (b) **6.4 Environmental Statement Figures [APP-145]**: the text included in the legend on Figure 3.4 (Grid Supply Point Substation Study Areas) (Sheets 1 to 4 inclusive).

6.2.4 Taking account of the request in the Section 51 Advice for any identified action points to be addressed by the Applicant prior to the Preliminary Meeting, the Applicant has therefore produced the following updated sets of plans:

- (a) **5.8 (B) Photomontages**; and
- (b) **6.4 (B) Environmental Statement Figures**.

6.2.5 The Applicant requests that the ExA updates the Examination Library to include each of the revised sets of plans mentioned above.

## **7 Other Matters (Preliminary Meeting Agenda Item 7)**

7.1 The Applicant has no other matters to raise at this time.

The Applicant trusts that this letter assists the ExA in advance of the Preliminary Meeting. The Applicant would be pleased to answer any queries which the ExA has on the matters raised herein at the Preliminary Meeting.

Yours sincerely,



John Bevan  
Senior Project Manager  
For and on behalf of National Grid Electricity Transmission

**Enc.**

**Appendix 1 – Initial Response to Assessment of Principal Issues**

## Appendix 1

### Initial Response to Assessment of Principal Issues

In order to assist the ExA in considering the principal issues (as set out at Annex C of the Rule 6 Letter), the Applicant has prepared the following table which signposts where the principal issues as set out in Annex C of the Rule 6 Letter are addressed in the application documents:

Issue Topic	ExA Comments	Applicant's References
1. Air Quality and Emissions	Construction dust control.	Section 3.3 of Environmental Statement (ES) Appendix 13.1: Dust Risk Assessment [APP-135], also Chapter 13 in the Construction Environmental Management Plans (CEMP) [APP-177] and the Code of Construction Practice (CoCP) [APP-178].
	Carbon dioxide equivalent (CO <sub>2</sub> e) (carbon dioxide and sulphur hexafluoride) and monitoring.	ES Appendix 4.3: Greenhouse Gas Assessment [APP-092] and Section 2.6 of ES Appendix 4.1: Good Design [APP-090].
2. Approach to the EIA and the ES	The documents that comprise the ES, and any relevance to the EIA of those that do not.	Section 2.7 of the Navigation Document [APP-004] and Table 1.2 and paragraph 1.4.11 of ES Chapter 1: Introduction [APP-069].
	The approach taken to the EIA in relation to cumulative effects.	ES Chapter 15: Cumulative Effects Assessment (CEA) [APP-083], in particular Section 15.4.
	The approach taken to the EIA in relation to the proposed limits of deviation, worst-case effects, and the Rochdale envelope.	ES Chapter 5: Environmental Impact Assessment (EIA) Approach and Method [APP-073] in particular Section 5.4, and also ES Chapter 4: Project Description [APP-072] in particular Sections 4.1 and 4.2.
3. Biodiversity, Ecology and Nature Conservation	The effect of the construction and operation of the Proposed Development on designated sites and habitats of nature conservation importance, including hedgerows, ancient woodland and veteran trees.	ES Chapter 7: Biodiversity [APP-075], in particular: <ul style="list-style-type: none"> <li>• <u>Designated sites</u>: Table 7.4, Table 7.5, Table 7.8 and paragraph 7.6.4 to 7.6.38, paragraph 7.6.168 and paragraph 7.7.3 to 7.7.11 [APP-075]. Also ES Appendix 7.1: Annex B Hintlesham Woods SSSI Assessment [APP-111].</li> <li>• <u>Hedgerows</u>: Paragraph 7.6.57 to 7.6.61, Table 7.9 and paragraph 7.6.171 [APP-075]. Also, ES Appendix 7.5: Important Hedgerows Assessment [APP-115] for baseline information.</li> <li>• <u>Ancient Woodland and Veteran Trees</u>: Paragraph 7.6.39 to 7.6.42 and paragraph 7.7.12 [APP-075]. Also, Section 4.2 in ES Appendix 7.1: Annex B Hintlesham Woods SSSI Assessment [APP-111]. Also, ES Appendix 7.4: Ancient Woodland and Potential Ancient Woodland Report [APP-114] for baseline information.</li> </ul>
	Permanent and temporary effects on species of nature conservation	ES Chapter 7: Biodiversity [APP-075], in particular paragraph 7.6.93 to 7.6.167, paragraph 7.6.176 to 7.6.198 and paragraph 7.7.14 to

Issue Topic	ExA Comments	Applicant's References
	importance, including protected species licensing.	7.7.19. Also, supporting baseline information in ES Appendix 7.7: Bat Survey Report [APP-117], ES Appendix 7.8: Dormouse Survey Report [APP-119], and ES Appendix 7.9: Badger Survey Report [APP-121/122].  Protected species licensing can be found in ES Appendix 7.6: Protected and Controlled Species Legislation Compliance Report [APP-116], ES Appendix 7.7: Annex A Bat Draft Licence [APP-118], ES Appendix 7.8: Annex A Dormouse Draft Licence [APP-120] and ES Appendix 7.9: Annex A Badger Draft Licence [APP-123/124].
	The adequacy of proposed mitigation and monitoring measures, and how they could be secured.	Sections 7.8 and 7.9 in ES Chapter 7: Biodiversity [APP-075]. Sections 7.2 and 7.3 in the CEMP [APP-177]. Also, good practice measures such as GG06 to GG08 and B01 to B13 in the CoCP [APP-178]. Embedded measure and mitigation in Tables 2.1 and 3.1 of the Register of Environmental Actions and Commitments (REAC) [APP-179]. The CEMP, CoCP and REAC are secured through Requirement 4 of the Draft Development Consent Order (DCO) [APP-034].
	The Habitats Regulations Assessment;	Habitats Regulations Assessment Report [APP-057].
	Biodiversity Net Gain and the future management and control of created habitats.	Requirement 13 of Schedule 3 to the draft DCO [APP-034] secures biodiversity net gain. Environmental Gain Report [APP-176]. Also, the Landscape and Ecological Management Plan (LEMP) [APP-182], in particular Chapters 9 and 10.
4. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations	Whether the full extent of the land, rights and powers that are sought are required.	Section 7.5 in Statement of Reasons [APP-038] and Statement of Reasons Appendix A: Details of Purpose for Which Compulsory Acquisition and Temporary Possession Powers are Sought [APP-039].
	Whether a compelling case in the public interest has been established;	The Statement of Reasons [APP-038]. Chapter 3 in the Need Case [APP-161] and also Chapter 3 in the Planning Statement [APP-160].
	Whether adequate funding for compensation (including any blight) is likely to be available to carry out the Compulsory Acquisition within the statutory period.	Chapter 5 in the Funding Statement [APP-037].
	Whether all reasonable alternatives to Compulsory Acquisition and Temporary Possession have been explored.	Section 7.4 in Statement of Reasons [APP-038] and Statement of Reasons Appendix B Schedule of Negotiations with Land Interests [APP-040].

Issue Topic	ExA Comments	Applicant's References
	The accuracy of the Book of Reference.	Book of Reference [APP-042]. Also, the Consultation Report Appendix J Land Referencing Methodology [APP-053].
	Whether the purposes stated for Compulsory Acquisition are legitimate and sufficient to justify any interference with the human rights of those affected.	Chapter 9 in Statement of Reasons [APP-038]
	The acquisition of any statutory undertakers' land or rights over such land and the detriment that may be caused to the carrying on of the undertaking in question, including whether the tests of s127(2), (3), (5) and (6) and s138(4) of the PA2008 are satisfied.	Section 8.3 in the Statement of Reasons [APP-038]. Also, the Book of Reference [APP-042].
	The adequacy of Protective Provisions in the dDCO;	Paragraph 4.14 of the Explanatory Memorandum [APP-035] and Articles 43, 44 and 51 of, and Schedule 14 to, the draft DCO [APP-034]. Also, Paragraphs 5.5.14 and 8.3 of the Statement of Reasons [APP-038].
	Whether the proposals meet the requirements of the PA2008 in all other respects.	Section 55 Acceptance of Applications Checklist (Planning Inspectorate, 2023) and the Planning Statement [APP-160], including Appendix A and B which provide signposting for compliance with the relevant National Policy Statements. .
5. Construction	Construction phasing and timetable, including linkages to strategic and local highway management;	Section 4.4 of ES Chapter 4: Project Description [APP-072] and ES Appendix 4.2: Construction Schedule [APP-091]. Also, Sections 2.2 and 2.3 in the CEMP [APP-177].
	Proposed temporary construction compounds;	Table 4.3 in ES Chapter 4: Project Description [APP-072] and paragraph 4.26 to 4.2.11 in CEMP [APP-177].
	Construction site and compound lighting proposals;	Table 4.6 in ES Chapter 4: Project Description [APP-072] and Section 6.4 in the CEMP [APP-177].
	Construction working hours;	Requirement 7 of Schedule 3 to the draft DCO [APP-034] and Paragraphs 4.3.21 to 4.3.24 of the Explanatory Memorandum [APP-035]. Section 4 of ES Chapter 4: Project Description [APP-072] and Section 2.3 of the CEMP [APP-177].
	Works that could take place outside the construction working hours;	Requirement 7 of Schedule 3 to the draft DCO [APP-034] and Paragraphs 4.3.21 to 4.3.24 of the Explanatory Memorandum [APP-035]. Section 4 of ES Chapter 4: Project Description [APP-072] and Section 2.3 of the CEMP [APP-177].



Issue Topic	ExA Comments	Applicant's References
	Ground conditions, land stability and mechanisms for reporting unexpected land contamination found during construction.	ES Chapter 10: Geology and Hydrogeology [ <b>APP-078</b> ], in particular paragraph 10.5.2 to 10.5.4 and 10.5.8 to 10.5.10. Also, ES Appendix 10.1: Geology Baseline and Preliminary Risk Assessment [ <b>APP-130</b> ]. Also, paragraph 10.3.10 to 10.3.18 in the CEMP [ <b>APP-177</b> ] and GH01 in the CoCP [ <b>APP-178</b> ].
	Suitability of ground conditions for trenchless installation.	Paragraph 10.6.14 to 10.6.16 in ES Chapter 10: Geology and Hydrogeology [ <b>APP-078</b> ] and Section 3.4 in ES Appendix 10.2: Groundwater Baseline and Assessment [ <b>APP-131</b> ].
	The health and safety aspects of the proposed approach to pylon demolition.	Section 4.5 of ES Chapter 4: Project Description [ <b>APP-072</b> ].
	Adequacy of the Code of Construction Practice and construction management plans, and how these would be secured.	Requirement 4 of Schedule 3 to the draft DCO [ <b>APP-034</b> ], Section 1.3 of the CEMP [ <b>APP-177</b> ] and Section 1.2 in the CoCP [ <b>APP-178</b> ]. A draft CoCP was included as Appendix 4.1 of the Scoping Report [ <b>APP-157</b> ] for comment. The updated draft CoCP was also issued to the relevant planning authorities and other relevant statutory consultees and comments were considered as part of the CEMP included in the application for development consent, see paragraph 5.2.1 of the CEMP [ <b>APP-177</b> ].
	Restoration of land following the effects of temporary construction works or activities.	ES Chapter 4: Project Description [ <b>APP-072</b> ], in particular paragraph 4.4.68 to 4.4.71. Also, Chapter 8 in the LEMP [ <b>APP-182</b> ], LEMP Appendix B: Vegetation Reinstatement Plan [ <b>APP-184</b> ] and Chapter 11 of the CEMP [ <b>APP-177</b> ].
6. Draft Development Consent Order (dDCO)	Relevant definitions.	Article 2 of, and Paragraph 1 of Schedule 3 to, the draft DCO [ <b>APP-034</b> ]. Paragraphs 3.6 and 4.3.6 of the Explanatory Memorandum [ <b>APP-035</b> ].
	The appropriateness of the articles, Requirements and Schedules of the draft DCO.	Paragraphs 2, 3 and 4 of the Explanatory Memorandum [ <b>APP-035</b> ].
	Application and modification of legislative provisions.	Articles 55 and 56 of, and Schedules 15 and 16 to the draft DCO [ <b>APP-034</b> ] and Paragraphs 3.59 and 3.60 of the Explanatory Memorandum [ <b>APP-035</b> ].
	Protective Provisions.	Articles 43, 44 and 51 of, and Schedule 14 to the draft DCO [ <b>APP-034</b> ]. Paragraph 4.14 of the Explanatory Memorandum [ <b>APP-035</b> ]. Also Paragraphs 5.5.14 and 8.3 of the Statement of Reasons [ <b>APP-038</b> ]
7. Good Design	Site and route selection and alternatives, including the	Section 2.2 in ES Appendix 4.1: Good Design [ <b>APP-090</b> ]. ES Chapter 3: Alternatives Considered [ <b>APP-071</b> ]. Section 5.8 in Planning

Issue Topic	ExA Comments	Applicant's References
	application of the Holford and Horlock Rules;	Statement [APP-160] and Chapter 4 in Evolution of the Project [APP-166].
	How the Proposed Development would meet good design tests, both generally and more specifically at the existing and proposed substations and the cable sealing end compounds.	ES Appendix 4.1: Good Design [APP-090] and the Planning Statement [APP-160].
8. Historic Environment	The effect of the Proposed Development on the significance of heritage assets, including the special architectural or historic interest of listed buildings and their settings and the character and appearance of conservation areas.	Sections 8.6 and 8.7 in ES Chapter 8: Historic Environment [APP-076]. Chapter 4 in ES Appendix 8.2: Historic Environment Impact Assessment [APP-127]. Also, ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128].
	The adequacy of the archaeological Written Scheme of Investigation and how it would be secured.	Requirement 6 of Schedule 3 to the draft DCO [APP-034]. Paragraph 3.1.2 in the Archaeological Framework Strategy [APP-186], and the Outline Written Scheme of Investigation [AS-001]. Both the Archaeological Framework Strategy [APP-186], and the Outline Written Scheme of Investigation [AS-001] were submitted as drafts to the relevant planning authorities for comment, see line 5.2.1 and 5.2.2 in Table 5.1 in the Draft Statement of Common Ground Local Authorities [APP-168].
9. Human Health	The direct and indirect effects of the Proposed Development on human health and wellbeing, including from Electromagnetic Fields (EMFs).	A standalone health and wellbeing assessment was scoped out of the ES in Section 4.11 of the Scoping Opinion [APP-159]. Also see paragraph 5.3.13 to 5.3.17 in ES Chapter 5: EIA Approach and Method [APP-073]. Also, Chapter 2 in ES Appendix 15.1: Cumulative Effects Baseline [APP-140]. Also, the Electric and Magnetic Field Compliance Report [APP-056].
10. Landscape and Views	The temporary and permanent effects of the Proposed Development on landscape character and quality.	Sections 6.6 and 6.7 in ES Chapter 6: Landscape and Visual [APP-074], in particular Table 6.1, Table 6.2 and Table 6.3, and Section 3 of ES Appendix 6.3: Assessment of Effects on Landscape Character [APP-100].
	The temporary and permanent effects of the Proposed Development on views.	Sections 6.6 and 6.7 in ES Chapter 6: Landscape and Visual [APP-074], in particular Table 6.1, Table 6.2 and Table 6.3, and ES Appendix 6.4: Viewpoint Assessment Parts 1 to 7 [APP-101 to 107]. Also, Photomontages [APP-062 to 065].
	The representativeness of the viewpoints and photomontages.	ES Chapter 6: Landscape and Visual [APP-074], in particular paragraph 6.4.7 to 6.4.10 and paragraph 6.4.23 to 6.4.25. ES Appendix 6.4: Viewpoint Assessment Parts 1 to 7 [APP-101 to 107]. Also, Photomontages [APP-062 to 065]. The Applicant has attended meetings with the

Issue Topic	ExA Comments	Applicant's References
		relevant planning authorities to discuss viewpoint locations and through that process, agrees with the viewpoint locations that inform the landscape and visual chapter of the ES, see line 3.4.2 in Table 3.1 in the Draft Statement of Common Ground Local Authorities [APP-168].
	The viewpoint analyses and photomontages and their relationship to the proposed limits of deviation.	ES Chapter 6: Landscape and Visual [APP-074], in particular paragraph 6.4.23 to 6.4.25. ES Appendix 6.4: Viewpoint Assessment Parts 1 to 7 [APP-101 to 107]. Also, Photomontages [APP-062 to 065] in particular Chapter 3.
	Assumptions used in the LVIA in relation to limits of deviation and Order Limit boundary vegetation.	ES Chapter 6: Landscape and Visual [APP-074], in particular paragraph 6.4.26, paragraph 6.11.5 to 6.11.6, and Table 6.6. Also, LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] and LEMP Appendix B: Vegetation Reinstatement Plan [APP-184].
	Mounding and landscape planting mitigation proposals, including timing, management and maintenance.	Section 6.8 and 6.9 of ES Chapter 6: Landscape and Visual [APP-074]. The LEMP [APP-182], in particular Chapters 8 and 9. LEMP Appendix B: Vegetation Reinstatement Plan [APP-184]. Sections 6.2 and 6.3 in the CEMP [APP-177]. Also, good practice measures such as LV01 to LV03 in the CoCP [APP-178]. Embedded measure and mitigation in Tables 2.1 and 3.1 of the REAC [APP-179]. The LEMP, CEMP, CoCP and REAC are secured through Requirement 4 of Schedule 3 to the draft DCO [APP-034].
	Hedgerow and woodland reinstatement planting proposals, including timing, management and maintenance.	The LEMP [APP-182], in particular Sections 8.4, 8.5 and 9.2. LEMP Appendix B: Vegetation Reinstatement Plan [APP-184]. LEMP Appendix C: Planting Schedules [APP-185].
	Rationale for additional enhancement proposals and mechanisms for securing them.	Environmental Gain Report [APP-176], in particular Chapter 7.
11. Land Use and Soil	The effect of the Proposed Development on agricultural land and farming, including agri-environmental schemes.	Section 11.6 and 11.7 of ES Chapter 11: Agriculture and Soils [APP-079].
	Agricultural Land Classification and the effect on soil resources.	Section 11.6 and 11.7 of ES Chapter 11: Agriculture and Soils [APP-079]. Also, ES Appendix 11.1: Agricultural Land Classification Survey [APP-133].
	The adequacy of soil management measures and how they would be secured.	Section 11.8 of ES Chapter 11: Agriculture and Soils [APP-079]. Chapter 11 of the CEMP [APP-177], and good practice measures such as AS01 to AS10 in the CoCP [APP-178].
	Approaches to micro-siting.	Section 2.4 in the LEMP [APP-182] and Section 2.4 of the CEMP [APP-177].

Issue Topic	ExA Comments	Applicant's References
	The effect of the Proposed Development on tourist and other local businesses.	Socio Economics and Tourism Report [APP-066], ES Chapter 15: CEA [APP-083], in particular paragraph 15.6.4 to 15.6.8.
12. Noise and Vibration	The effects of noise and vibration from the construction and operation of the Proposed Development, including construction traffic.	Section 14.6 and 14.7 in ES Chapter 14: Noise and Vibration [APP-082]. Also, ES Appendix 14.2: Construction Traffic Noise and Vibration Assessment [APP-137], ES Appendix 14.3: Overhead Line Noise Assessment [APP-138] and ES Appendix 14.4: Grid Supply Point Substation Noise Assessment [APP-139].
	The adequacy of proposed noise and vibration mitigation measures and how these would be secured.	Section 14.8 in ES Chapter 14: Noise and Vibration [APP-082]. Chapter 14 in the CEMP [APP-177]. Also, good practice measures such as NV01 in the CoCP [APP-178]. The CEMP and CoCP are secured through Requirement 4 of Schedule 3 to the draft DCO [APP-034].
13. The Water Environment	Compliance with the Water Framework Directive.	Water Framework Directive (WFD) Assessment [APP-060], in particular Table 4.1 and Table 4.2 and paragraph 5.1.4 to 5.1.6.
	Proposals for surface water drainage, management of site drainage, the adequacy of proposed measures and how they would be secured.	ES Chapter 4: Project Description [APP-072], in particular Table 4.8 and paragraph 4.9.33 to 4.9.34. ES Chapter 9: Water Environment [APP-077], in particular paragraph 9.6.36 to 9.6.41, paragraph 9.6.44 to 9.6.46 and paragraph 9.7.4 to 9.7.8. The CEMP [APP-177], in particular Section 9.3. Also, good practice measures such as W07, W12, W13 and W16 in the CoCP [APP-178]. The CEMP and CoCP are secured through Requirement 4 of Schedule 3 to the draft DCO [APP-034]. Also, Requirement 5 of Schedule 3 to the draft DCO [APP-034].
	The effect of the Proposed Development on water resources including quality;	ES Chapter 9: Water Environment [APP-077], in particular paragraph 9.6.4 to 9.6.23, paragraph 9.6.42 to 9.6.43 and paragraph 9.7.3.
	The effect on main rivers, ordinary watercourses and drainage systems, including temporary bridging proposals;	Section 9.6 and 9.7 of ES Chapter 9: Water Environment [APP-077]. Also, WFD Assessment [APP-060], in particular Chapter 4 and Appendix 2.
	Dewatering, abstraction and discharge proposals and the associated licensing;	ES Chapter 9: Water Environment [APP-077], in particular Table 2.1 and paragraph 9.6.32 to 9.6.35, paragraph 9.6.42 to 9.6.43 and paragraph 9.7.3. Also, the CEMP [APP-177], in particular paragraph 9.3.8 to 9.3.11.
	Effects on flood risk;	Flood Risk Assessment [APP-059], in particular Chapter 4. ES Chapter 9: Water Environment [APP-077], in particular paragraph 9.6.36 to 9.6.41 and paragraph 9.7.4 to 9.7.8.

Issue Topic	ExA Comments	Applicant's References
	The resilience of the development to flood risk.	Flood Risk Assessment [ <b>APP-059</b> ], in particular Chapter 4. Also, ES Appendix 4.1: Good Design [ <b>APP-090</b> ], in particular paragraph 2.3.1 to 2.3.2.
14. Transport and Traffic	The effects of the Proposed Development on the operation of the strategic and local road network.	Transport Assessment [ <b>APP-061</b> ], in particular Sections 7.2 and 7.3.
	The effects of the Proposed Development on local access arrangements.	Transport Assessment [ <b>APP-061</b> ], in particular Sections 7.2 and 7.3. Also, the Construction Traffic Management Plan (CTMP) [ <b>APP-180</b> ], in particular Section 5.5 and Section 5.7.
	The effects of the Proposed Development on highway safety.	Transport Assessment [ <b>APP-061</b> ], in particular paragraph 7.3.15 to 7.3.19 and Appendix A. Also, the CTMP [ <b>APP-180</b> ], in particular Section 5.8.
	The effects of construction traffic on local amenity and safety.	Transport Assessment [ <b>APP-061</b> ], in particular Section 6.5 and Section 7.5. ES Chapter 12: Traffic and Transport [ <b>APP-080</b> ], in particular Section 12.6. Also, ES Appendix 12.1: Traffic and Transport Significance of Effects Tables [ <b>APP-134</b> ].
	The effects of the Proposed Development on public rights of way, including bridleways.	Transport Assessment [ <b>APP-061</b> ], in particular Section 6.5 and Section 7.5. ES Chapter 12: Traffic and Transport [ <b>APP-080</b> ], in particular paragraph 12.6.5 to 12.6.11. Also, ES Appendix 12.1: Traffic and Transport Significance of Effects Tables [ <b>APP-134</b> ].
	The effects of the Proposed Development on public transport.	Transport Assessment [ <b>APP-061</b> ], in particular Section 5.5, Section 6.4 and Section 7.4 for the bus network; in particular paragraph 1.3.8 for train services.
	The effects of the Proposed Development on emergency services vehicles.	Transport Assessment [ <b>APP-061</b> ], in particular Sections 7.2 and 7.3.
	The effects of the Proposed Development on railway services.	Transport Assessment [ <b>APP-061</b> ], in particular paragraph 1.3.5. ES Chapter 12: Traffic and Transport [ <b>APP-080</b> ], in particular paragraph 12.3.6. Also, Section 1.4 of the CTMP [ <b>APP-180</b> ].
	The effects of the Proposed Development on navigation of rivers.	Transport Assessment [ <b>APP-061</b> ], in particular paragraph 1.3.8. ES Chapter 12: Traffic and Transport [ <b>APP-080</b> ], in particular paragraph 12.3.8. Also, Section 1.5 of the CTMP [ <b>APP-180</b> ] and good practice measure W17 in the CoCP [ <b>APP-178</b> ].
Adequacy of proposals to manage public rights of way and construction traffic, including	The CTMP [ <b>APP-180</b> ], in particular Section 2.4 (which outlines the proposed use of the Permit Schemes) and Chapters 5, 6 and 7. The CTMP is secured through Requirement 4 of Schedule 3 to	

Issue Topic	ExA Comments	Applicant's References
	routing and speed limits, and how these would be secured.	the draft DCO [APP-034]. Article 12 of the draft DCO [APP-034] and Paragraph 3.16 of the Explanatory Memorandum [APP-035] cover application of the Permit Schemes. See also Articles 11, 47, 50 of, and Schedules 7 and 12 to, the draft DCO [APP-034] and Paragraphs 3.19, 3.52 and 3.54 of the Explanatory Memorandum [APP-035].