

BT-NG-020621-545-0222

# Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.5.2: Applicant's Comments on Written Representations

Final Issue A  
October 2023

Planning Inspectorate Reference: EN020002

The Infrastructure Planning (Examination Procedure) Rules 2010) Regulation 8(1)(k)



**Page intentionally blank**

# Contents

---

<b>1.</b>	<b>Introduction</b>	<b>1</b>
1.1	Document Purpose	1
1.2	Project Overview	1
<b>2.</b>	<b>Written Representations from Organisations</b>	<b>2</b>
2.1	Alphamstone and Lamarsh Parish Council [REP2-015]	2
2.2	Pebmarsh Parish Council [REP2-017/018]	5
2.3	Anglian Water Services Limited [REP2-019]	7
2.4	Cadent Gas Limited [REP2-020]	8
2.5	Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Partnership [REP2-021]	10
2.6	East Anglia Three Limited c/o Scottish Power Renewables [REP2-022]	16
2.7	Environment Agency [REP2-023]	16
2.8	Historic England [REP2-024/025]	22
2.9	Natural England [REP-026/027]	25
2.10	Network Rail Infrastructure Limited [REP2-028]	34
2.11	Pivoted Power LLP [REP2-029]	35
2.12	Royal Mail [REP-030]	36
2.13	Suffolk Preservation Society [REP2-031]	37
2.14	The Woodland Trust [REP2-032]	41
<b>3.</b>	<b>Written Representations regarding Dedham Vale Cable Sealing End Compound</b>	<b>46</b>

3.1	Location of the Dedham Vale East CSE Compound	46
<b>4.</b>	<b>Written Representations from Individuals</b>	<b>51</b>
4.1	Alan Hall [REP2-041/042/043]	51
4.2	Belinda Nott [REP2-054]	52
4.3	C E Gardiner and Sons [REP2-039/040]	55
4.4	Francis Prosser [REP2-060/061]	58
4.5	Peter Nott [REP2-057]	68
4.6	Robert Arthur David Cowlin [REP2-036]	69
4.7	Simon Gilbey (Mr G V S Nott of D P Nott & Sons) [REP2-056]	71
4.8	Nigel Heyworth Morgan [REP2-044/045]	73

---

Table 2.1 – Alphamstone and Lamarsh Parish Council (ALPC) [REP2-015]	2
Table 2.2 – Pebmarsh Parish Council [REP2-017/018]	5
Table 2.3 – Anglian Water Services Limited [REP2-019]	7
Table 2.4 – Cadent Gas Limited [REP2-020]	8
Table 2.5 – Dedham Vale AONB and Stour Valley Partnership [REP2-021]	10
Table 2.6 – East Anglia Three Limited c/o Scottish Power Renewables [REP2-022]	16
Table 2.7 – Environment Agency [REP2-023]	16
Table 2.8 – Historic England [REP2-024/025]	22
Table 2.9 – Natural England [REP-026/027]	25
Table 2.10 – Network Rail Infrastructure Limited [REP2-028]	34
Table 2.11 – Pivoted Power LLP [REP2-029]	35
Table 2.12 – Royal Mail [REP2-030]	36
Table 2.13 – Suffolk Preservation Society [REP2-031]	37
Table 2.14 – The Woodland Trust [REP2-032]	41
Table 3.1 – Location of the Dedham Vale East CSE Compound	46
Table 4.1 – Alan Hall [REP2-041/042/043]	51
Table 4.2 – Belinda Nott [REP2-054]	52
Table 4.3 – C E Gardiner and Sons [REP2-039/040]	55
Table 4.4 – Francis Prosser [REP2-060/061]	58
Table 4.5 – Peter Nott [REP2-057]	68
Table 4.6 – Robert Arthur David Cowlin [REP2-036]	69
Table 4.7 – Simon Gilbey (Mr G V S Nott of D P Nott & Sons) [REP2-056]	71
Table 4.8 – Nigel Heyworth Morgan [REP2-044/045]	73

# 1. Introduction

## 1.1 Document Purpose

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on Written Representations (WR) made by Interested Parties (IPs) and Affected Persons (APs) in response to an application for development consent for the Bramford to Twinstead Reinforcement (the project). A total of 50 IPs and APs submitted Written Representations (WR) to the Planning Inspectorate. Those WR were published on 13 October 2023.
- 1.1.2 The 50 WR submitted at Deadline 2 have been reviewed and answered in full. Some Interested Parties and Affected Persons submitted more than one WR (containing for example summaries or appendices). Where this is the case, multiple WR references will appear in the table header after the Interested Party/ Affected Person.
- 1.1.3 The sequence in which the WR appear in this document follows the reference numbering in the Examination Library wherever possible. The 'Reference' column in the tables refers to paragraph or section numbering used within the WR (where this is applicable).
- 1.1.4 Section 2 of this document contains the responses to WR submitted by organisations, including prescribed consultees.
- 1.1.5 There were 19 WR which were identical in content and points raised regarding the location of the Dedham Vale East Cable Sealing End (CSE) Compound. The Applicant has responded to all 19 WR in a single response, which can be found in Section 3 of this document.
- 1.1.6 Section 4 of this document contains WR from individuals, including Affected Persons.

## 1.2 Project Overview

- 1.2.1 An application for development consent was submitted to the Planning Inspectorate on the 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of overhead lines, underground cables and grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works.
- 1.2.2 The application for development consent was accepted for Examination on the 23 May 2023.
- 1.2.3 A full description of the project can be found in Environmental Statement (ES) Chapter 4: Project Description [**APP-072**].

## 2. Written Representations from Organisations

### 2.1 Alphamstone and Lamarsh Parish Council [REP2-015]

Table 2.1 – Alphamstone and Lamarsh Parish Council (ALPC) [REP2-015]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Adequacy of consultation	<p>The consultation process can hardly have been described as one in which landowners and residents were adequately consulted, or even consulted at all, before many of the Consultation plans were drawn up or measures were taken.</p> <p>The manner in which details were disseminated left many homeowners and landowners confused and unsure of the project plan and timescales involved.</p> <p>It is clear [...] that there has been a general lack of debate and/or consultation and timely liaison with many of the landowners and homeowners, for example:</p> <ul style="list-style-type: none"> <li>the imposition of the temporary access route across landowner's fields to determine without consulting landowners as to the route and/or undertaking any relevant groundwork analysis to determine whether the selected route was suitable or feasible. [...]"</li> <li>the positioning of pylon 4YLA6C within the curtilage of Abbots in the September 2022 consultation document without any discussion with the homeowner [...]</li> </ul>	<p>Table 2.2 of the Applicant's Comments on Relevant Representations [REP1-025] sets out the Applicant's response to comments regarding the quality and/or level of public consultation. From this, it is worth reiterating that the Applicant held a total of three consultation periods on its proposals since work resumed on the project in 2020, following extensive consultation between 2009 and 2013 prior to the project being paused. The development of proposals has been an iterative process, with proposals developing at each stage of consultation.</p> <p>To raise awareness and provide information on the project at each stage of consultation, a range of communication channels were used. These include making information available online and at deposit point locations, writing to commercial and residential addresses within the vicinity of the project, online webinars, 'ask the experts' sessions, face-to-face consultation events, legal notices and social media advertising.</p> <p>The Applicant recognises that some of the information provided as part of these consultations was technical in nature and which therefore may have been difficult for some in the local community digest. As such, it sought to provide a more accessible/plain English version of these materials, such as through the project background document, which also included a non-technical summary of the preliminary environmental information report.</p> <p>Table 2.13 of Applicant's Comments on Relevant Representations [REP1-025] sets out the Applicant's approach regarding the identification of the temporary access routes. The Technical Note on Temporary Access Route off the A131 (<b>document 8.5.5</b>) submitted at Deadline 3 summarises the options and details of this temporary route. This includes explaining the various different locations that were considered, taking into account local constraints and project requirements. Based on this work, the Applicant consulted on the proposed temporary access route at the targeted consultation. It has also had subsequent discussions with landowners.</p>

Reference Matter	Points Raised	Applicant's Comments
		As noted by the author, the positioning of 4YLA6C within the curtilage of Abbots in some targeted consultation plans was in error and did not accurately represent the proposed position of this pylon. This was addressed directly with the landowner during the consultation.
N/A	Approach to construction communications	Section 3.4 of the Construction Environmental Management Plan (CEMP) ( <b>document 7.5 (B)</b> ) sets out the Applicant's proposed engagement techniques with members of the local community during the construction phase. A community relations team will be appointed to provide dedicated community relations and external communication support during construction.
1	Proposals to mitigate disruption to habitats and dwellings	<p>i) ALPC recommends Horizontal Augur Boring (HAB) under Moat Lane to prevent the proposed removal and destruction of the protected lane and to protect the distinctive vegetation and elm verge.</p> <p>ii) ALPC also recommends an extension of HDD drilling to the west and north near to pylon 4YLA003 to mitigate further the impact (noise, visual disruption) to Ansell's.</p> <p>iii) ALPC recommends aligning the underground cable as close to [the] northern boundary [of Rhyne Park Farm].</p> <p>iv) Daws Hall Cottage, and the houses/cottages along Pitmire Lane are identified by the author as dwellings in mind of measures to mitigate disruption, but no specific measures are suggested.</p> <p>i) TC44 of Table 8.8 in the Consultation Report [<b>APP-043</b>] provides the Applicant's response to the first part of this request. The Applicant has not yet appointed a main works contractor. As such, the exact construction method for crossing Moat Road cannot be committed to at this time, therefore a worst-case open cut solution has been assumed. This will be further considered as part of the detailed design.</p> <p>ii) TC42 of Table 8.8 in the Consultation Report [<b>APP-043</b>] provides the Applicant's response to the second part of this request. The Applicant has committed to a trenchless crossing to the south of Ansell's Grove to avoid impacts on the local wildlife site and vegetation within the valley. The exact length and location of the trenchless crossing will also need to consider the ground conditions, construction technique and health and safety requirements regarding working close the existing 400kV overhead line, which would be operational and live during construction. Therefore, movement of the trenchless crossing back to 4YLA003 could not be made at this time.</p> <p>iii) TC60 of Table 8.8 in the Consultation Report [<b>APP-043</b>] provides the Applicant's response to the third part of this request. Feedback received from stakeholders during the statutory consultation (spring 2022) expressed concerns about the proximity of construction activities to Alphamstone, as well as concerns around the impact on sensitive parts of the environment and the suitability of the local road network for large construction vehicles. As a result, the Applicant made changes to the proposals in the western part of the Stour Valley. The changes affected the reinforcement between Moat Lane and the proposed Stour Valley</p>

Reference	Matter	Points Raised	Applicant's Comments
			<p>West cable sealing end (CSE) compound and moved the route to the north of Henny Back Road. The revised routeing as presented at targeted consultation passes to the north of Rhyne Park Farm.</p> <p>iv) With regard to the fourth part of this request, as noted in TC12 of Table 8.8 in the Consultation Report [<b>APP-043</b>], the Applicant is in active discussions with the landowner at Daws Hall Cottage to reduce impacts to this and neighbouring properties where practicable.</p>
2	Need for two temporary access routes	ALPC recommends that the proposed access road to the south of pylon PCB80 is joined to the principal east-west access road along the 132kV corridor. This will ensure that no site traffic comes through Lamarsh Village, but instead is accessed from the B1508. The removal of pylons PCB80 and PCB81 can be achieved from the principal east-west temporary access road that joins the B1508.	<p>Ref TC62 of Table 8.8 in the Consultation Report [<b>APP-043</b>] provides the Applicant's response to this request. The B1508 is proposed to be used by construction traffic in addition to Henny Road. The Applicant has reviewed the need for construction traffic to use Henny Road (Lamarsh); this review has confirmed that Henny Road would be required for construction traffic. The exact type of construction traffic using this road would be confirmed during detailed design. The Applicant will endeavour to reduce impacts during construction.</p> <p>Furthermore, the Applicant has identified that it would be unable to build the western side of the crossing over the River Stour without construction traffic travelling through Lamarsh to the existing rail crossing near the village hall. As such, it is not feasible to remove these construction accesses.</p>
3	Proposals to restrict construction traffic from using village roads and protected lanes	ALPC requires that the village roads and all protected lanes should be signed to read "No site traffic allowed" and all site traffic and subsidiary site traffic should be redirected through the haul roads. Road safety is an issue that needs addressing by the Applicant as a priority.	<p>The inclusion of the temporary access route off the A131 within the Applicant's proposals would reduce the number of vehicles needing to use local roads during the construction phase.</p> <p>Heavy goods vehicles (HGV) will generally use the strategic road network (SRN) before using the local road network/A roads to access the site. Light goods vehicles will favour the SRN and A roads where practicable and where this will not lead to excessive trip distance and journey time. This means that some site traffic may be routed via the local road network. However, construction workers would be encouraged to follow the same principles as the HGV routeing.</p> <p>Road safety is considered in detail as part of the application and further details as to how this would be managed are set out in the Construction Traffic Management Plan (<b>document 7.6(B)</b>), including in paragraphs 5.4.14, 5.4.15, 5.5.4 and 5.5.5.</p> <p>The proposals would also be subject to a Road Safety Audit undertaken in accordance with Essex and Suffolk County Councils' procedures, and would require approval by those authorities before work can commence.</p>



Reference	Matter	Points Raised	Applicant's Comments
4	Proposals regarding communication of construction programme	ALPC suggests that the Applicant issues a clear programme that provides clarification and understanding of the effect of scheduling of works on the Parishes and surrounding areas.”  This should be enhanced by a liaison officer who should work with local stake holders about timings and schedules of work.	Section 3.4 of the CEMP ( <b>document 7.5(B)</b> ) sets out the Applicant's proposed engagement techniques with members of the local community during the construction phase. This includes providing information regarding planned construction works. The information to be provided would be specific to the works to be carried out, describing the nature of the works, the location and extent of the works, the duration of works and the hours to be worked.  As outlined above, an appointed community relations team will be responsible for liaising with the local community.

## 2.2 Pebmarsh Parish Council [REP2-017/018]

Table 2.2 – Pebmarsh Parish Council [REP2-017/018]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Temporary access route off the A131	Has the Applicant explored, evaluated, and shown evidence that the proposed haul road route is the best option?	The Applicant's response is detailed in Technical Note on Temporary Access Route off the A131 ( <b>document 8.5.5</b> ).
N/A	Temporary access route off the A131	Is the Applicant requiring temporary or permanent access rights over agricultural land and what are the long-term implications?	The Applicant requires access both to construct and maintain its apparatus. All temporary access routes would be removed, and the land restored to agriculture, but if required in future these temporary access routes may be rebuilt to allow for refurbishment works.  Articles 26 and 27 of the dDCO ( <b>document 3.1 (C)</b> ) requires the Applicant and UKPN (respectively) to restore land to the landowner's reasonable satisfaction. Those Articles also make clear that compensation is payable to the owners and occupiers of land of which temporary possession is taken for any loss or damage arising from the exercise of temporary possession powers. Accordingly, the risk of long-term implications is minimised.
N/A	Other matters	We would like answers to what the impacts are on the following areas as we are aware that surveys have not been completed or the information is not currently available:	The Applicant has responded in relation to surveys in the Applicant's Response to Preliminary Meeting Action on Temporary Access Route ( <b>document 8.2.2</b> ) regarding the Temporary Access Route off the A131, Section 4, p.11.  As noted in Table 3.1 in the Applicant's Response to Rule 9 Letter Dated 24 July 2023 [ <b>AS-005</b> ], the baseline habitat information presented within the ES [ <b>APP-075</b> ]

Reference Matter	Points Raised	Applicant's Comments
	<ul style="list-style-type: none"> <li>● Operation of agriculture and business;</li> <li>● Prime agricultural land;</li> <li>● Soil and drainage;</li> <li>● PRow;</li> <li>● Ecology and landscape;</li> <li>● Passage of traffic;</li> <li>● Visual impact of the haul road and new overhead lines;</li> <li>● Trees and hedgerows;</li> <li>● Archaeology;</li> <li>● Surface run off;</li> <li>● Air Quality, dust, and noise;</li> <li>● Biota; and</li> <li>● Property values.</li> </ul>	<p>was based on desk study information, including project data searches from the Local Records Centre. High resolution aerial imagery was used to support the baseline assessment. This showed that the temporary access route crosses arable fields with hedgerows as described in ES Appendix 7.1: Habitats Baseline Report <b>[APP-109]</b> and shown on Habitats of Protected Species and Important Habitats <b>[APP-014]</b>.</p> <p>The ecological verification surveys undertaken in August 2023 and the survey results can be found in the Ecological Survey of the Temporary Access Route off the A131 <b>[REP1-036]</b> submitted at Deadline 1.</p> <p>As stated in paragraph 3.1.2 of the Ecological Survey of the Temporary Access Route off the A131, the surveys confirm that the temporary access route off the A131 passes through arable fields, which are low ecological value habitats. This confirms the assumptions made in the ES at Appendix 7.1: Habitats Baseline Report <b>[APP-109]</b>.</p> <p>An arboricultural survey of the temporary access route off the A131 was also undertaken in August 2023. The results are presented in the updated Arboricultural Impact Assessment <b>[REP1-012]</b> published at Deadline 1. This confirms that no veteran trees are likely to be affected as a result of the proposed temporary access route off the A131.</p> <p>Landscape and Ecological Management Plan (LEMP) Appendix A: Vegetation Retention and Removal Plan <b>[APP-183]</b> submitted with the application for development consent included the vegetation likely to be affected from the temporary access routes and visibility splays along the A131 on Sheet 30.</p> <p>The Applicant notes there will be temporary effects on the agricultural businesses from the temporary access route, which are a matter for compensation.</p> <p>The Applicant has sought and received copies of the Affected Persons' drainage plans and will take these into account in designing its own drainage scheme to minimise the effect of the project.</p> <p>The visual effect of the temporary access route is significant but temporary.</p> <p>The Applicant's Construction Environment Management Plan (<b>document 7.5(B)</b>) covers the measures that would be employed to reduce construction effects on the environment including surface run off, dust, air quality, biota, soils, trees and hedgerows.</p> <p>The question of property values is not a material consideration however compensation will be considered where a relevant claim is made.</p>

Reference	Matter	Points Raised	Applicant's Comments
N/A	Temporary access route off the A131	How is the temporary access route constructed and at what width?	The Applicant has provided a Technical Note on Temporary Access Route off the A131 at Deadline 3 ( <b>document 8.5.5</b> ) which sets out the details on how this would be constructed.
N/A	Temporary access route off the A131	How much traffic will be going to the CSE compound and what quantity of additional traffic is required for the construction of the temporary access route?	The Applicant has provided information about traffic in the Comments on Relevant Representation [ <b>REP1-025</b> ], Thematic Response 13: Options and Routing – Temporary Access Route off the A131. There is further detail in the Technical Note on Temporary Access Route off the A131 ( <b>document 8.55</b> ).
N/A	Temporary access route off the A131	How will the temporary access route be policed?	The Applicant has considered this under Key Issue 'Security of construction areas and neighbouring properties in the Applicant's Comments on Relevant Representation. p.132 [ <b>REP1-025</b> ].

## 2.3 Anglian Water Services Limited [REP2-019]

Table 2.3 – Anglian Water Services Limited [REP2-019]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Statement of Common Ground	Anglian Water is satisfied that the Applicant's Comments on Relevant Representations [ <b>REP1-025</b> ] clearly responds to the matters it has raised, and this is reflected in the draft Statement of Common Ground (SoCG) between both parties.	The Applicant has no comment to make on this matter.
N/A	Protective Provisions	The Protective Provisions for the Protection of Anglian Water (Schedule 14 Part 3) in the draft DCO were agreed between both parties through pre-submission discussions as identified in the draft SoCG.	The Applicant has no comment to make on this matter as the Protective Provisions have already been agreed.
N/A	Interfaces between the project and the Bury St	Our main area of focus continues to be the interface between our own 69km strategic pipeline project between Bury St Edmunds and Colchester and the Bramford to Twinstead	The Applicant and Anglian Water have held meetings to discuss the construction interfaces between the two projects, the areas of land in common, and to seek to agree a Construction Interface Agreement between the parties to provide a framework for collaboration in relation to the timelines for construction of both

Reference	Matter	Points Raised	Applicant's Comments
	Edmunds to Colchester strategic pipeline	Reinforcement. Planning applications were submitted for this section of our strategic pipeline with the relevant local planning authorities in December 2022 (West Suffolk Council, Babergh and Mid Suffolk Council and Colchester City Council). Recently, 61km of the 69km length of the pipeline has been granted planning permission by West Suffolk Council and Babergh and Mid Suffolk Councils.	projects. The Construction Interface Agreement is currently still in discussion and is yet to be agreed but both parties anticipated agreement by the end of the examination.

## 2.4 Cadent Gas Limited [REP2-020]

Table 2.4 – Cadent Gas Limited [REP2-020]

Reference	Matter	Points Raised	Applicant's Comments
<b>1 Introduction</b>			
1.3	Cadent Gas Limited's assets	Cadent has low, medium, intermediate and high pressure gas pipelines and associated below and above ground apparatus located within the Order Limits which are affected in multiple locations by works proposed and which may require diversions subject to the impact. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits need to be maintained at all times and access to inspect such apparatus must not be restricted.	The Applicant and Cadent Gas have held meetings to discuss the interface between their assets and the project to outline a hierarchy of measures to manage these construction interfaces. These are detailed in the draft SoCG ( <b>document 8.3.6.2</b> ) which has been agreed by both parties.
1.4	Protective Provisions	Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected	The Applicant and Cadent Gas are currently in discussion to agree Protective Provisions through their respective legal representatives and will provide an update at a future deadline.

Reference	Matter	Points Raised	Applicant's Comments
		and to include compliance with relevant safety standards.	
1.5	Diversion of Cadent Gas assets	Cadent wish to ensure appropriate land rights are available for any diversion of their assets sitting outside the adopted highway boundary and will require consent to be granted where there are proposals to work within the easement strip of any existing Cadent's Apparatus	The Applicant and Cadent Gas have held meetings to discuss the interface between their assets and the project to outline a hierarchy of measures to manage these construction interfaces. From these discussions, Cadent Gas assets will not require any diversions, they will be protected in situ. These are detailed in the draft SoCG ( <b>document 8.3.6.2</b> ) which have been agreed by both parties.

## 2 Regulatory Protection Framework

2.1 – 2.3	Compliance with relevant safety documents	<p>Cadent require all Promoters carrying out Authorised Development in the vicinity of their Apparatus to comply with:</p> <p>(a) CD/SP/SSW/22 Cadent's policies for safe working in the vicinity of Cadent's Assets;</p> <p>(b) ICE (institution of Gas Engineers) recommendations IGE/SR/18 Edition 2 Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations, and</p> <p>(c) the HSE's guidance document HS(G)47 Avoiding Danger from Underground Services.</p>	The Applicant and Cadent Gas have held meetings to discuss the interface between their assets and the project to outline a hierarchy of measures to manage these construction interfaces. From these discussions, Cadent Gas assets will be protected in situ and follow guidance as outlined in document (a). This is detailed in the draft SoCG ( <b>document 8.3.2.2</b> ) which have been agreed by both parties.
-----------	---	---	---

## 3 Protective Provisions

3.1 – 3.8	Protective Provisions	<p>Cadent seeks to protect its statutory undertaking, and insists that in respect of works in close proximity to their Apparatus as part of the authorised development procedures are complied with by the Applicant.</p> <p>The proposed Order does not contain any specific Protective Provisions expressed to be for the protection of Cadent, making it currently deficient from Cadent's perspective.</p>	The Applicant and Cadent Gas are currently in discussion to agree Protective Provisions through their respective legal representatives and will provide an update at a future deadline.
-----------	-----------------------	--	---

Reference Matter	Points Raised	Applicant's Comments
	<p>Cadent contend that it is essential that these issues are addressed to their satisfaction to ensure adequate protection for their Apparatus and that Protective Provisions on their standard terms are provided.</p> <p>The form of the Protective Provisions which Cadent are seeking appear at Appendix 2 to this Representation.</p>	

## 2.5 Dedham Vale Area of Outstanding Natural Beauty (AONB) and Stour Valley Partnership [REP2-021]

Table 2.5 – Dedham Vale AONB and Stour Valley Partnership [REP2-021]

Reference Matter	Points Raised	Applicant's Comments
1	<p>Impacts on the Dedham Vale AONB's defined natural beauty</p> <p>As listed In the Alison Farmer Associates (2016) Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks, hereafter referenced as the Alison Farmer Associates (AFA) Report (2016).</p> <p>Impacts on the Dedham Vale AONB defined natural beauty during: (a) construction and (b) operation.</p> <ul style="list-style-type: none"> <li>● Landscape quality</li> <li>● Scenic quality</li> <li>● Relative wildness</li> <li>● Relative tranquillity</li> <li>● Natural heritage features</li> </ul>	<p>The assessment of the impacts of the project on the natural beauty indicators defined in the AFA Report (2016) were considered as part of the assessment presented in ES Chapter 6: Landscape and Visual [APP-074] and ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098]. Further details in relation to the assessment on each specific quality are provided in the Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032] provided at Deadline 1.</p> <p>(a) <u>Construction</u></p> <p>As stated in paragraph 2.5.19 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098], there would be significant direct and indirect adverse effects on the landscape of the AONB. This would be mainly due to the scale of the construction activities associated with the 400kV underground. The natural beauty indicators of the AONB - notably scenic quality, relative wildness and relative tranquillity would be adversely affected. Further details regarding each specific special quality can be found in Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032]. The documents conclude that although there would be significant adverse effects during construction, these would be experienced relatively locally within approximately 1km of the Limits of Deviation (LoD) and would</p>

Reference Matter	Points Raised	Applicant's Comments
	<ul style="list-style-type: none"> <li>Cultural heritage</li> </ul>	<p>be short term, temporary and mainly reversible, it is not considered that the overall integrity of the AONB would be affected during construction.</p> <p>(b) <u>Operation</u></p> <p>As stated in paragraph 2.5.22 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098], the reduction in the presence of high voltage electricity infrastructure within the northern part of the AONB, specifically within the valley of the River Box and wider landscape setting of Polstead Hall, would enhance the overall landscape within the AONB and contribute positively to its natural beauty indicators. Paragraph 3.1.8 of Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032], concludes that this would bring about long term significant beneficial effects on some of the special qualities of the AONB, particularly those related to perceptual qualities such as scenic quality, remoteness and tranquillity.</p>
2 Ability of AONB to deliver statutory function	During: (a) construction and (b) operation.	<p>The assessment of the impacts of the project on the ability of the AONB to delivery statutory functions was considered as part of the assessment presented in ES Chapter 6: Landscape and Visual [APP-074] and ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098]. Further details in relation to the assessment on the ability to deliver statutory functions is also provided in the Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032].</p> <p>As stated in ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [APP-099] the statutory purpose of the AONB is '<i>to conserve and enhance the area's natural beauty</i>'.</p> <p>(a) <u>Construction</u></p> <p>As reported in paragraph 2.5.18 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [APP-098] and Table 6.1 of ES Chapter 6: Landscape and Visual [APP-074], the assessment identifies short term potentially major adverse (significant) effects on the landscape of the AONB during construction within approximately 1km of the from the LoD.</p> <p>Further details are provided in the Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032], where the Applicant notes that these construction effects would occur in an area which is already affected by the presence of the existing 132kV and 400kV overhead lines and by commercial fruit farming. The absence of roads through this part of the AONB and presence of only one Public Right of Way (PRoW) along the wooded Box Valley also means that there are few public locations from where the effects of the construction activities would be experienced.</p>

Reference Matter	Points Raised	Applicant's Comments
		<p>Paragraph 3.2.4 concludes that when taking a worst case, and not taking into account the rolling topography and high tree cover which would help screen the construction activities, a very small proportion of the designated area is affected (the Order Limits cover approximately 0.49% of the total area of Dedham Vale AONB) and that the remaining designated area would be unaffected. Therefore, although there would be temporary, localised effects during construction, these are not anticipated to impact on the ability of the AONB to deliver its statutory purpose during construction.</p> <p>(b) <u>Operation</u></p> <p>Paragraph 2.5.22 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [APP-098], concludes that given the long term significant beneficial nature of the likely effects associated with the removal of the existing 132kV overhead line, the integrity of the wider AONB would not be compromised. The reduction in the presence of high voltage electricity infrastructure within the northern part of the AONB, specifically within the valley of the River Box and wider landscape setting of Polstead Hall, would enhance the overall landscape within the AONB and enhance the ability of the AONB to deliver its statutory function during operation.</p>
3	Impacts on the Stour Valley Project Area's natural beauty	<p>During: (a) construction and (b) operation.</p> <p>The Applicant notes that the Stour Valley Project Area is not designated, however the area has similar picturesque landscape qualities to Dedham Vale AONB and is also covered within the same management plan (Dedham Vale AONB and Stour Valley Partnership, 2021) as described in paragraph 6.5.5 in ES Chapter 6: Landscape and Visual [APP-074].</p> <p>(a) <u>Construction</u></p> <p>Table 6.1 of ES Chapter 6: Landscape and Visual [APP-074], the assessment identifies short term potentially moderate adverse (significant) effects locally on the Stour Valley within approximately 1km of the from the LoD during construction.</p> <p>(b) <u>Operation</u></p> <p>Paragraph 6.12.7 of ES Chapter 6: Landscape and Visual [APP-074] concludes that there would be significant beneficial effects on the Stour Valley during operation from the removal of the 132kV overhead line and a section of 400kV overhead line.</p>
4	Consideration of the AONB	<p>That appropriate weight has been given to the nationally designated landscape by the Applicant, including:</p> <p>Paragraphs 7.3.82 to 7.3.90 of the Planning Statement [APP-160] specifically consider the acceptability of the project in respect to AONB policy. Paragraph 7.4.29 states '<i>it is considered that the project design aligns with the fundamental aim of the</i></p>



Reference	Matter	Points Raised	Applicant's Comments
		<ul style="list-style-type: none"> <li>Adherence to national and local policy and the Dedham Vale AONB management plan.</li> </ul>	<p><i>NPPF paragraph 176, in regard to conserving and enhancing landscape and scenic beauty in AONB.</i></p> <p>Paragraph 7.3.107 of the Planning Statement [<b>APP-160</b>] summarises that 'The assessment undertaken by National Grid is considered to be in accordance with the requirements of EN-1 and EN-5 in respect to landscape and visual impact, including the impact on the AONB and the implementation of undergrounding.'</p> <p>The Applicant also considers that the proposals align with the principles set out within the AONB management plan (2021).</p>
4	Consideration of the AONB	<ul style="list-style-type: none"> <li>Chosen method for undergrounding in AONB, AONB setting and Stour Valley Project Area.</li> </ul>	<p>Embedded measures EM-E01 and EM-G02 within the Register of Environmental Actions and Commitments (REAC) (<b>document 7.5.2 (B)</b>) commit the Applicant to using underground cables in Section E: Dedham Vale AONB and Section G: Stour Valley respectively. The REAC is secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>).</p> <p>As concluded in paragraphs 6.12.7 and 6.12.8 in ES Chapter 6: Landscape and Visual [<b>APP-074</b>], there would be significant beneficial effects on Dedham Vale AONB from the removal of the 132kV overhead line within the Box Valley. There would also be significant beneficial effects on the Stour Valley during operation as a result of the removal of the 132kV overhead line and a section of 400kV overhead line.</p>
5	Impacts on the setting of the AONB	<p>Including impacts on the nationally designated landscape from:</p> <ul style="list-style-type: none"> <li>CSE compounds.</li> </ul>	<p>The options appraisal sought to avoid locating the CSE compounds within both the AONB and its setting. Further detail can be found in Section 3.9 and Table 3.13 of ES Chapter 3: Alternatives Considered [<b>APP-071</b>].</p> <p>The assessment of effects on the AONB is presented at ES Appendix 6.2 Assessment of Effects on Designated Landscapes [<b>APP-098</b>]. Paragraph 2.2.4 states that with regards to the Stour Valley East and Stour Valley West CSE compounds, these are located some 2.2km and 4.9km from the AONB boundary respectively. Although within the area defined as setting, the intervening landform and vegetation would obscure any views across and into/out of the AONB.</p> <p>Dedham Vale West CSE compound location was chosen away from the AONB boundary to reduce effects on setting and benefits from young trees to screen the site. As stated in paragraph 3.9.5 of ES Chapter 3: Alternatives Considered [<b>APP-071</b>], this site was chosen due to the screening offered by the existing landform and planting.</p>

Reference Matter	Points Raised	Applicant's Comments
		<p>Dedham Vale East CSE compound has also been located away from the AONB boundary. Paragraph 2.5.11 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098] concludes that at Year 1, the effects of this would be minor adverse (not significant) and by Year 15 would be outweighed by the long-term significant beneficial effects of removing the existing 132kV overhead line in association with the underground cables and trenchless crossing of the Box Valley.</p> <p>Based on the above, the Applicant considers that there would be no significant effects on the AONB from the location of the CSE compounds.</p>
5	<p>Impacts on the setting of the AONB</p> <ul style="list-style-type: none"> <li>New overhead transmission lines (outside the AONB).</li> </ul>	<p>The assessment of effects on the AONB is presented at ES Appendix 6.2 Assessment of Effects on Designated Landscapes [APP-098]. Paragraph 2.5.11 concludes that at Year 1, the new 400kV overhead line would be noticeable from the part of the AONB to the north and north-west of Polstead as evidenced by viewpoint E-10 in ES Appendix 6.4: Viewpoint Assessment Section E Part 4 [APP-104].</p> <p>The new 400kV pylons would increase the proportion of available views occupied by overhead line infrastructure. From the edge of the AONB near Leavenheath, views would be restricted to occasional gaps in the tall roadside hedgerows which line Brick Kiln Lane. As evidenced by viewpoint E-2.17, the new 400kV pylons would also be seen in the context of the existing 400kV overhead line as well as the commercial orchards and polytunnels associated with Boxford Fruit Farm. Paragraph 2.5.17 notes that the effects of this on the landscape within the AONB would be minor adverse (not significant) at Year 1 and by Year 15 would be outweighed by the long-term significant beneficial effects of removing the existing 132kV overhead line in association with the underground cables.</p>
6	<p>Suitability of measures to avoid, minimise, mitigate and compensate for negative impacts</p> <p>The quality of and appropriateness of measures to avoid, minimise, mitigate and compensate for any negative impacts on the AONB and Stour Valley.</p>	<p>The Applicant has embedded measures into the design of the project which are set out in the REAC (<b>document 7.5.2 (B)</b>) and secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>). These include the following which apply to Dedham Vale AONB and the Stour Valley:</p> <ul style="list-style-type: none"> <li>Removal of the 132kV overhead line between Burstall Bridge and Twinstead Tee (EM-P02);</li> <li>Removal of approximately 2km of the existing 400kV overhead line south of Twinstead Tee (EM-G01);</li> <li>Landscape planting around the four CSE compounds (EM-D01, EM-F01, EM-G03 and EM-G06) and the GSP substation (EM-H02);</li> </ul>

Reference Matter	Points Raised	Applicant's Comments
		<ul style="list-style-type: none"> <li>● Underground cable through Section E: Dedham Vale AONB (EM-E01)</li> <li>● Underground cable through parts of Section G: Stour Valley (EM-G02).</li> </ul> <p>All construction projects result in short term temporary effects on the landscape during construction due to, for example, the presence of construction vehicles, stockpiles of soil and materials and construction fencing being present in the landscape. The measures set out in the LEMP (<b>document 7.8 (B)</b>), CEMP (<b>document 7.5 (B)</b>) and Code of Construction Practice (CoCP) (<b>document 7.5.1 (B)</b>) would reduce these effects.</p> <p>Although there would be temporary significant adverse effects during construction, the Applicant notes that the project would result in significant beneficial effects on the AONB and Stour Valley during operation. It would be a perverse situation if the Applicant were required to compensate for the significant adverse temporary effects of removing the overhead line, given the main purpose being the long term benefits to the AONB.</p>
7	<p>Other issues of interest</p> <p>Impacts on tourism industry during construction.</p> <p>The impacts of the proposals on the ability of residents and visitors to enjoy the Dedham Vale AONB and Stour Valley, its natural beauty and special qualities, including as a place of residence, to operate business (including but not limited to agricultural operations), public access and enjoyment of the countryside during construction.</p>	<p>Chapter 5 of the Socio Economics and Tourism Report [<b>APP-066</b>] concludes that there are no likely significant effects on the tourism industry. Direct effects on visitor attractions and features were generally avoided through the project design and routing. There is potential for temporary amenity effects during construction, which could affect how tourists experience the area as a whole. However, the good practice measures set out in the CoCP (<b>document 7.5.1 (B)</b>) would reduce these effects to a non-significant level.</p> <p>As noted in the response to point 7 above, there is potential for temporary amenity effects during construction, which could affect how tourists (and visitors) experience the area as a whole. However, the good practice measures set out in the CoCP (<b>document 7.5.1 (B)</b>) would reduce these effects to a non-significant level.</p> <p>As stated in ES Chapter 4: Project Description [<b>APP-072</b>], no PRoW would be permanently stopped up or diverted on the project. The Applicant notes that there is an absence of roads through the part of the AONB where the works would be undertaken and there is only one PRoW (along the Box Valley). This means that there are few public locations from where the effects of the construction activities would be experienced. The Applicant has undertaken PRoW surveys, which provide evidence that the relevant PRoW within the Order Limits have very low usage.</p> <p>ES Chapter 12: Traffic and Transport [<b>APP-080</b>], assesses the effects on PRoW. This notes that footpaths would only be disrupted for a short period of time (typically</p>

Reference Matter	Points Raised	Applicant's Comments
		less than four weeks duration) and concludes that there are no significant effects to PRow within the AONB or Stour Valley during construction. Therefore, the Applicant does not consider that the project would affect the ability of residents and visitors to enjoy the Dedham Vale AONB and Stour Valley or would affect public access and enjoyment of the countryside.

## 2.6 East Anglia Three Limited c/o Scottish Power Renewables [REP2-022]

Table 2.6 – East Anglia Three Limited c/o Scottish Power Renewables [REP2-022]

Reference Matter	Points Raised	Applicant's Comments
N/A	Project co-ordination	Interface between the proposed works at Bramford Substation for the project and Order limits for the East Anglia THREE offshore wind farm project.
		The Applicant is continuing to engage with East Anglia THREE as part of the ongoing discussions regarding the interface and SoCG ( <b>document 8.3.6.4</b> ) and will provide updates into Examination at a relevant deadline. Due to the nature of the interface between the two projects there will likely be a commercial agreement required for co-ordination of both projects.

## 2.7 Environment Agency [REP2-023]

Table 2.7 – Environment Agency [REP2-023]

Reference Matter	Points Raised	Applicant's Comments
<b>1.0 Fisheries, Biodiversity and Ecology</b>		
1.1	Design of bridges	The Environment Agency is pleased that the Applicant has confirmed that the design of bridges will allow unrestricted passage of wildlife (as per W17 in the CoCP). This should be sufficient to allow the unrestricted movement of most wildlife along the banks of the rivers.
		Noted. The Applicant has no comment to make on this matter.

Reference	Matter	Points Raised	Applicant's Comments
1.2	Culverting	<p>The Applicant has confirmed that it is not practicable to provide bridges instead of culverts at the crossing points of minor watercourses (non-main rivers). Whilst we maintain that temporary bridges would be preferable to culverts as the impacts of bridges on riparian habitats and Water Framework Directive Hydromorphological Quality Elements will be lower than culverts we accept the Applicant's reasoning.</p> <p>If culverts are to be used, there should be a firm commitment to remove these at the end of the construction period and to fully re-instate the watercourse. This should include the reinstatement of appropriate bed material, and a commitment that the restored sections of watercourse will have natural banks and not artificially reinforced banks.</p>	<p>As stated in paragraph 9.3.34 of the CEMP (<b>document 7.5(B)</b>), all temporary crossings and/or culverts would be removed post construction unless otherwise agreed in the Flood Risk Activity Permit (FRAP)/Ordinary Watercourse Consent. Watercourses would be reinstated to at least the same condition as prior to construction and in accordance with the details provided within the relevant FRAP/Ordinary Watercourse Consent. This includes reinstatement of the bank profile and bed levels. It is also anticipated to include replacing any channel substrate that was temporarily removed during the works.</p> <p>As stated in Table 2.1 of the CEMP (<b>document 7.5(B)</b>), the Applicant intends to apply for Ordinary Watercourse Consents from the Lead Local Flood Authorities for works to ordinary watercourses where works have the potential to impede flow.</p>
1.3	Overpumping and fish friendly pumps	<p>Overpumping risks the killing or injury of fish present in watercourses. The Environment Agency welcomes B13 regarding fish pumps and screening. We recommend that in accordance with best practice, a screen size of 2mm should be used. If it is intended to use fish friendly pumps (i.e., without the use of screening) then the suitability of such pumps should be agreed in advance with the Environment Agency.</p>	<p>In response to the Written Representation, the Applicant has updated B13 the CoCP at Deadline 3 (<b>document 7.5.1 (B)</b>) to delete 3mm i.e. '<i>... The use of pumps to move water will require 2mm screening to avoid the impingement offish and juvenile eels</i>'. The Applicant has agreed to look at the wording of B13 to see if the wording needs further amendment in relation to the reference to fish friendly pumps.</p>
<b>2.0 Pollution Prevention</b>			
2.1	Sediment fencing	<p>The Environment Agency welcomes the inclusion of sediment fencing of temporary access routes that is secured by Requirement 4 of the draft DCO.</p>	<p>Noted. The Applicant has no comment to make on this matter.</p>
2.2	Pollution boom	<p>The Applicant should define the type of pollution boom for W02, as referred to in</p>	<p>Paragraph 9.3.15 of the CEMP (<b>document 7.5 (B)</b>) references W02, which aims to capture runoff and pollutants to prevent their entry into the watercourse. This states</p>

Reference Matter	Points Raised	Applicant's Comments
	<p>Section 7.3 of our Relevant Representation. We note that the Applicant has stated that this has not been explicitly defined within the application as the Applicant has not yet appointed a Main Works Contractor who would be responsible for confirming the measures. We would request that we are informed as soon as possible.</p>	<p>that in addition, measures are presented to mitigate a spill event such as the positioning of spill kits, booms and other containment devices downstream of the crossing. These measures are examples that could be provided to mitigate a spill. It would be up to the main works contractor to define the measures that would be appropriate to mitigate a spill event at a specific location.</p> <p>The Applicant does not consider it necessary for the Environment Agency to confirm the measures proposed by the Main Works Contractor for managing pollution risks across the project. The Applicant employs competent contractors chosen from its Framework Supplier who have to undergo rigorous checks as part of their appointment to demonstrate their competence at managing environmental risks on major construction projects.</p>
<h3>3.0 Groundwater and Contaminated Land</h3>		
3.1 and 3.2	<p>Hydrogeological risk assessment</p> <p>In relation to GH07 and the hydrogeological risk assessment, the Environment Agency notes that this should not be 'for information' but submitted well in advance for approval to the Environment Agency.</p> <p>Furthermore, it is stated that the Environment Agency will have up to 10 working days to respond on the hydrogeological risk assessment and their comments will be considered as part of finalising the risk assessment. We do not consider this a reasonable timescale and suggest a minimum of a 21 day period applies, with a preference for a pre-submission to address any issues well in advance and to avoid any delays.</p>	<p>In response to the Written Representation, the Applicant has updated GH07 in the CoCP at Deadline 3 (<b>document 7.5.1 (B)</b>) to note that this would be submitted for approval and to align with the 21 days requested by the Environment Agency.</p> <p>The following text has been added to the wording of GH07: '<i>The hydrogeological risk assessment will be submitted to the Environment Agency for approval prior to construction. The Environment Agency will have up to 21 working days to respond on the hydrogeological risk assessment and their comments will be considered as part of finalising the risk assessment. This can be supported by a pre-submission draft to reduce the risk of any delays.</i>'</p> <p>The draft SoCG with the Environment Agency has been updated at Deadline 3 (<b>document 7.3.3</b>) to show that this matter has now been moved to matters agreed.</p>
3.3	<p>Clay bungs</p> <p>The Environment Agency welcomes that the CoCP states that clay bungs will be constructed within trench excavations where necessary to prevent the creation of preferential drainage pathways</p>	<p>Noted. The Applicant has no comment to make on this matter.</p>

Reference	Matter	Points Raised	Applicant's Comments
<b>Flood Risk</b>			
4.1	Flood Risk	The Environment Agency can confirm that it has no outstanding flood risk concerns. All flood risk information can be found within our relevant representation.	Noted. The Applicant has no comment to make on this matter.
<b>Flood Defences/Maintenance</b>			
5.1	Flood defences	In its relevant representation [RR-031], the Environment Agency raised concerns around flood defences at the location of the temporary crossing of the River Stour at Lamarsh. It is pleased that the Applicant has confirmed that it does not envisage any disruption to the flood bank in this location. In addition, the Applicant will also need to apply for a flood risk activity permit.	Noted. The Applicant has no comment to make on this matter.
<b>Water Resources</b>			
6.1	Water resources	Following relevant representation [RR-031], the only additional comments the Environment Agency has on water resources is that the Applicant should be aware the water company will not be legally required to provide them with water for the A134 compound.	Noted. The Applicant has no comment to make on this matter.
<b>Water Quality</b>			
7.1	Water Framework Directive (WFD)	The Environment Agency is satisfied that our previous comments regarding WFD and no deterioration have been addressed. The Environment Agency therefore has no further comments on water quality.	Noted. The Applicant has no comment to make on this matter.

Reference Matter	Points Raised	Applicant's Comments
<b>Navigation</b>		
8.1 to 8.3 Navigation	<p>The Environment Agency is the Navigation Authority for the River Stour (Suffolk) and is responsible for ensuring the navigation width is appropriate. It defines this as the 'Navigation Envelope' the minimum channel width is 6m and the minimum headroom above normal retention levels is 3m. The reduction in the Navigation Envelope with temporary and permanent structures should be minimised in both the construction and operational phases.</p> <p>If the Applicant wishes to lay any obstructions or install other temporary structures in the river, it would need formal consent from the Environment Agency and this may include action, or support, that is chargeable.</p>	<p>The only works that would affect the navigation rights are for safety reasons in relation to the installation and removal of the temporary bridge at the River Stour and removal of the 132kV overhead line. As noted in paragraph 1.5.3 of the CTMP (<b>document 7.6(B)</b>), these are anticipated to be short term in duration (i.e. up to one week for each).</p> <p>The Applicant is intending to apply for formal consent for the works that would affect navigation along the river. Once the approach has been agreed, the Applicant suggests that this consent is added to Table 2.1 of the CEMP (<b>document 7.5</b>), compliance with which is secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>). This is being discussed with the Environment Agency and an update will be provided in the Statement of Common Ground with the Environment Agency (<b>document 7.3.3 (B)</b>) at a future deadline.</p>
8.4 Navigation	<p>Demonstration and justification is needed that the Navigation Envelope will be maintained during both any temporary and permanent structures.</p> <ul style="list-style-type: none"> <li>● The Environment Agency recommends the Applicant tell local river-based clubs about their plans for the works and discuss any concerns they may have. In making the arrangements. Organisers should ensure that the works do not unreasonably impede the rights of other river users, such as fishermen or boats in transit. The Environment Agency recommends that the Applicant contacts the relevant angling and boat clubs for the area concerned.</li> <li>● The Environment Agency recommends the Applicant places notices advising all river users the works are taking place, ideally</li> </ul>	<p>The Applicant can confirm that there are no permanent structures proposed that would affect navigation of the river. Therefore, all following comments relate to the temporary works only:</p> <ul style="list-style-type: none"> <li>● The Applicant has undertaken a desk study and is not aware of any local river-based clubs using the section of the River Stour within the Order Limits. No clubs or organisations were identified through the consultation undertaken on the project. If the Environment Agency has any details of these clubs, then the Applicant would be happy to include details on these within the relevant section of the CTMP (<b>document 7.6 (B)</b>).</li> <li>● Paragraph 1.5.3 of the CTMP (<b>document 7.6 (B)</b>) states that notices would be placed up and downstream of the Order Limits at least four weeks in advance to notify river users of the works.</li> <li>● The Applicant is anticipating to undertake the relevant works (lowering of the 132kV overhead line and installing and removing the temporary bridge) during daylight hours when there is good visibility, as this would reduce risks to the workforce as well as people using the river. The timing of the works would be set</li> </ul>



Reference Matter	Points Raised	Applicant's Comments
	<p>upstream and downstream of the event site.</p> <ul style="list-style-type: none"> <li>The Environment Agency advises the Applicant to carries out works over the river only during the hours of daylight and in good visibility conditions and that works take place during the winter months of November to March to reduce the impact on river users.</li> <li>The Environment Agency advises the Applicant provides an adequate number of safety boats suitable for rescue, manned by competent personnel, along with a sufficient number of marshals throughout the area of the works, to be alert to potential risks.</li> </ul>	<p>out within the relevant consents and would need to consider flood risk if undertaken over winter months.</p> <ul style="list-style-type: none"> <li>Paragraph 1.5.3 of the CTMP (<b>document 7.6 (B)</b>) states that a boat would be moored in the river to prevent and warn users accessing the working area during the conductor lowering and bridge works.</li> </ul>
<p>8.5      Navigation</p>	<p>The Environment Agency believe requirements should be secured against the DCO, and those requirements should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>Requirement – Temporary works during cross river structure. Details should be provided of the positioning of any structures within the river channel, including although not limited to, safety boats, buoys, jetties, scaffolding, and platform or work barges. These details should include justification for any construction works within or above the river channel and the extent of timescale needed for the works.</li> <li>Requirement – Any Permanent cross river structure encroachment. Details should be</li> </ul>	<p>The Applicant is continuing to discuss this matter with the Environment Agency to understand what is involved in terms of the consent and approval that would be required. It is anticipated that this would require an additional consent to be added to Table 2.1 of the CEMP, as per other consents that are not disapplied by the draft DCO (<b>document 3.1 (C)</b>). The matter is included in Table 5.1 of the SoCG (<b>document 7.3.3 (B)</b>) as to confirm if this approach is acceptable.</p> <p>No permanent structure is required within the channel. Therefore, the Applicant considers that an additional Requirement relating to a permanent structure is unnecessary.</p>

Reference Matter	Points Raised	Applicant's Comments
	provided on the final positioning and extent of encroachment above the river channel.	

## 2.8 Historic England [REP2-024/025]

Table 2.8 – Historic England [REP2-024/025]

Reference Matter	Points Raised	Applicant's Comments
2.5 to 2.10, 4.2 Hintlesham Hall – Impact of the proposals	<p>The change to the parkland setting through the introduction of an additional 400kV overhead line pylons would affect how the hall is experienced. This would result in harm to the significance that Hintlesham Hall derives from its setting.</p> <p>The proposals would also change the views from the stable block of Hintlesham Hall and will be seen in conjunction with the hall and its landscape. This would also affect how the hall is experienced and result in harm to the significance that Hintlesham Hall derives from its setting.</p> <p>Historic England consider this would amount to less than substantial harm.</p>	<p>The Applicant notes the response from Historic England, that there would be harm to the significance that Hintlesham Hall derives from its setting but that this would amount to less than substantial harm. This aligns with the Applicant's conclusions in paragraph 5.1.6 of ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128], which states that the assessment '<i>concludes that the degree of change to the historic assets would not result in substantial harm to Hintlesham Hall or its ancillary buildings. As set out in this report, minor non-significant effects constitute 'harm', and this degree of harm would be justified by the public benefit gained as a result of the project.</i>'</p>
2.11, 2.22, 2.24, 3.1.1 to 3.1.2, 3.3.1 to 3.3.5 and 4.3 Hintlesham Hall – Impact of the proposals	<p>Historic England broadly accept the findings of ES Appendix 8.2: Annex A Hintlesham Hall Assessment. Except the assessment of the impact on Hintlesham Hall and its consideration of the LoD. Historic England does not think the LoD and potential changes to the positions of pylons RB3 and RB4 have been fully taken into account. Photomontage HV-01 shows the proposed development with the pylons located as negotiated. However, if</p>	<p>The Hintlesham Hall Assessment [APP-128] took into account the worst-case scenario taking into account the flexibility provided by the LoD. As set out in paragraph 4.4.2 and 4.3.12 respectively of ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128], any changes to the overhead line or changes to the pylon locations within the LoD would result in a change so marginal as to not influence the effects identified within the assessment.</p> <p>The Final Alignment of the overhead line including the pylons would be subject to a range of factors including the required distances between spans, local features such as roads and other services, as well as the local topography (which will also affect the final pylon height at any given location). Further considerations also</p>

Reference	Matter	Points Raised	Applicant's Comments
		<p>they were positioned differently along the line the proposal's impact would be greater.</p> <p>The Applicant has engaged in discussions to limit the visual impacts of the new overhead line in key views from Hintlesham Hall's stable block. Historic England has worked hard to limit these views and have concerns that the LoD could result in avoidable harm. Historic England would therefore like to see additional measures added to protect the view out from the stable block of Hintlesham Hall and prevent the relocation of pylons RB8 and RB9.</p> <p>ES Appendix 8.2: Annex A Hintlesham Hall Assessment concludes the effect would amount to no more than minor adverse. Historic England consider the impact would be adverse if the proposed pylon RB3 was moved south-west on the line or RB4 was moved northeast on the line. Historic England agrees with the conclusion of the report <i>'that the degree of change to the historic assets would not result in substantial harm to Hintlesham Hall or its ancillary buildings'</i>.</p> <p>Historic England recommend the assessment of the setting of, and impact of the project on, taking into account the potential locations of the pylons RB3 and RB4 is reconsidered by the Applicant and, where appropriate, the document revised and reissued for examination.</p> <p>Historic England recommend that proposals should provide a more definite location for the pylons further limiting their relocation.</p>	<p>include the need for a safe clearance space beneath the conductors and an allowance for the maximum distance within which conductors can swing in high winds (which is up to 30m either side of the centre line). This is shown on the figure in Appendix A of the Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034].</p> <p>Due to the presence of the existing 400kV overhead line and the need to maintain an 85m offset between the existing and the proposed overhead line and also allowing for maximum conductor swing, there is very little flexibility to move the pylons within the horizontal LoD (approximately 20m at this location).</p> <p>In addition, and in response to the feedback from Historic England, the Applicant has limited the longitudinal LoD to the north of Hintlesham Hall through updating the wording of EM-AB01 in the REAC at Deadline 3 (<b>document 7.5.2 (B)</b>). The additional wording states:</p> <p><i>'In utilising the LoD, National Grid will not position a pylon between the access track to Kennels Cottage (608112, 244204) and 100m to the south west of the track (608027, 244151) in order to avoid its visibility in key views from the Grade II* listed ancillary buildings located to the north of Hintlesham Hall, which comprise the converted service ranges, stables, coach house and brewhouse.'</i></p> <p>The Applicant is awaiting Historic England's feedback on the updated wording with the intention of providing an update as part of the Statement of Common Ground.</p>
2.12 to 2.19	National Policy Statement (NPS) and	Historic England provide references to various policy within the NPS and NPPF.	It is noted that Historic England is referencing the National Networks NPS instead of the relevant NPS for Energy (EN-1) and the NPS for Electricity Networks (EN-5). The Applicant notes that the paragraph references appear to correctly reference

Reference	Matter	Points Raised	Applicant's Comments
	National Planning Policy Framework (NPPF).		the paragraphs within the consultation draft on NPS EN-1 and not the current (2011) policy wording.  Tables A.1 and B.1 in the Planning Statement [ <b>APP-160</b> ] set out how the project aligns with the policy in EN-1 and EN-5 respectively. Section 8 in the Planning Statement sets out how the project aligns with the NPPF.
2.20 to 2.21	Historic England's Position – proposed route	In 2013, Historic England expressed concerns relating to this proposed route and its impact upon the setting of the grade I listed hall. However, it accepted that undergrounding the cable in this area would cause damage to potentially important natural habitats. Historic England stated that should the pylons be placed adjacent to the existing line then Corridor 2b would be the most appropriate route for the new power cable. The current route shown reflects that shown as Corridor 2b at pre-application.	The Applicant notes that corridor 2b (current route) would be the most appropriate route for the transmission reinforcement.
2.23, 4.4	Planting to the north of the Hintlesham Hall	The Applicant is proposing to increase the existing planting in the area between the Hall, its stable block and the overhead line as a mitigation measure, while this would reduce visibility in winter months, Historic England does not consider it would reduce the level of harm notably.	The Applicant is proposing landscape softening planting to the north of the Hall, which would comprise reinforcement planting along the existing hedgerow (MM04). The Applicant agrees that the effectiveness of this planting would be lower in winter. This planting was not factored into the assessment presented in ES Chapter 8: Historic Environment [ <b>APP-076</b> ] when determining the likely significant effects on the Hall.
2.25 to 2.27, 3.4.1 to 3.4.3, 4.5	Enhancements at Hintlesham Hall	Enhancements have been put forward in the form of landscape restoration of some lost elements of the designed landscape of Hintlesham Park including the avenue running south-west from the hall. Historic England consider restoring the avenue would be beneficial to Hintlesham Hall and its setting, through a greater understanding of the hall's context and status. This benefit would be more successful if the planting was an unbroken avenue.	The Environmental Gain Report [ <b>APP-176</b> ] provides information on the proposed enhancements including ENV02. This includes enhancements to the parkland including the partial restoration of the tree-lined avenue that extended to the south-west of the Hall and was a major landscape feature of the original historic parkland. This is described further in ENV02 in the Environmental Gain Report [ <b>APP-176</b> ].  Only partial restoration is being considered at this location as the Applicant is seeking to balance the benefits of the enhancement (an unbroken avenue), with the impacts that the avenue would cause on the landowner and their farming of their field. The landowner does not want the full avenue to be reinstated.

Reference	Matter	Points Raised	Applicant's Comments
2.28	Planning balance	In determining this application, the inspector must carry out the planning balance. Historic England particularly refer you to paragraph 5.9.26 which recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed.	The Applicant notes this response from Historic England. The planning balance in relation to this is addressed in paragraph 5.7.53 of the Planning Statement [APP-160].
3.2.1	Comments about the ES: Chapter 8 Historic Environment	The Applicant has provided a full ES, which includes ES Chapter 8: Historic Environment and supporting appendices. Historic England does not have any specific comments to make on the majority of designated heritage assets assessed in this document but focus on the two annexe documents relating to Hintlesham Hall.	Noted – the Applicant has no comment to make on this matter.

## 2.9 Natural England [REP-026/027]

Table 2.9 – Natural England [REP-026/027]

Reference	Matter	Points Raised	Applicant's Comments
<b>2 Internationally Designated Sites</b>			
2.1 - 2.4 and WR-NE01	Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar sites.	Natural England welcomes the detailed amendments made to the good practice measures GH06 and GH07 in the CoCP, which include consulting the Environment Agency for their comments on the hydrogeological risk assessment. Natural England also requests to be consulted on the hydrogeological risk assessment, to assess the potential impacts on the Stour and Orwell Estuaries SPA and Ramsar sites.	<p>The Environment Agency is the relevant authority in relation to matters relating to groundwater and surface water quality. Therefore, the Applicant considers that it is best placed to approve the hydrogeological risk assessment.</p> <p>The watercourses within the Order Limits provide the pathway of effect to the Stour and Orwell Estuaries SPA and Ramsar sites. Therefore, if the Environment Agency is satisfied that there is no risk to the surface water, then naturally by consequence there would be no risk to the Stour and Orwell Estuaries SPA and Ramsar sites downstream.</p>

Reference	Matter	Points Raised	Applicant's Comments
2.5, 2.6 and WR-NE02	CoCP wording in the HRA report	Natural England acknowledges that the Applicant will address our issue concerning a discrepancy in the wording used for the GH07 in the CEMP and the HRA Report and will ensure that the wording is the same in both documents.	The HRA Report was updated at Deadline 1 with the then current wording of GH07 [REP1-007/008]. However, the wording has been further updated following the Environment Agency's Written Representation [REP2-023] and this has been reflected in the CoCP which has been updated at Deadline 3 ( <b>document 7.5.1 (B)</b> ). The Applicant will add reference to the final wording required in the HRA Report in the errata list submitted at a future deadline.
2.7 and WR-NE03	No likely significant effects on specific topics	Natural England concurs with the HRA Report that there will be no likely significant effect with regard to groundwater and surface water quality during operation, habitat or species fragmentation, reduction in species density, disturbance/ displacement of SPA/Ramsar site featured bird species and air quality change during construction and operation.	The Applicant welcomes Natural England's agreement with the assessment and the reasoning provided in the HRA Report in respect of habitat or species fragmentation, reduction in species density, disturbance/displacement of SPA/Ramsar featured bird species and air quality change to internationally designated sites.

### Nationally Designated Sites

3.1 - 3.3	Site of Special Scientific Interest (SSSI)	On the basis of the current information submitted in relation to these sites, Natural England advises that the project could damage the interest features of the following designated sites: <ul style="list-style-type: none"> <li>● Hintlesham Woods SSSI;</li> <li>● Arger Fen SSSI; and</li> <li>● Little Blakenham Pit SSSI.</li> </ul>	The Applicant addresses the specific comments below.
3.4, WR-NE05, WR-NE07 and WR-NE08	Hintlesham Woods SSSI	Hintlesham Woods SSSI is at most direct risk of damage due to the close proximity of the works to be carried out. Natural England has raised a number of issues that relate to the interest features 'lowland mixed deciduous woodland' and 'assemblages of breeding bird – mixed: scrub and woodland'.  Natural England were advised that two technical notes would be provided: one to address a request to assess peak noise levels at Hintlesham Woods SSSI and one to explain	The Applicant has submitted the following technical notes at Deadline 3: <ul style="list-style-type: none"> <li>● Technical Note on Noise Levels at Hintlesham Woods (<b>document 8.5.9</b>) – this sets out the peak sound levels for works around Hintlesham Woods SSSI that need to be undertaken during bird breeding season due to the activities relying on an agreed outage; and</li> <li>● Technical Note on Ancient and Potential Ancient Woodland (<b>document 8.5.12</b>). This sets out details for each specific ancient woodland and potential ancient woodland, the works involved and any measures required to reduce the effects of the works on the woodland. This includes Hintlesham Little Wood.</li> </ul>

Reference	Matter	Points Raised	Applicant's Comments
		<p>the proposals at each ancient woodland within 15m of the Order Limits. Once these documents have been received and reviewed, Natural England will be able to provide further comment on whether the issues raised have been appropriately addressed.</p> <p>Monitoring surveys for schedule 1 bird species during construction works in the vicinity of Hintlesham Woods SSSI is advised.</p>	<p>The Applicant welcomes feedback from Natural England on these technical notes.</p> <p>The Applicant notes that as it has committed to undertaking the majority of works around Hintlesham Woods SSSI outside of bird breeding season, and has also made additional commitments that would limit the duration and disturbance for the limited remaining works. Therefore, the Applicant does not consider there to be a need to undertake monitoring surveys within the woodland during construction.</p>
3.5 WR-NE09	Hintlesham Woods SSSI	<p>Natural England welcomes the Applicant's confirmation in the comments to Relevant Representation that coppicing (rather than cutting trees to the ground) will be carried out under the existing overhead line at Hintlesham Woods SSSI and the wording of the LEMP will be updated to reflect this.</p> <p>Natural England also acknowledges that the Applicant will update the LEMP to include protection of coppiced areas from deer browsing.</p>	<p>The Applicant has updated the LEMP (<b>document 7.8 (B)</b>) at Deadline 3 to remove references to cutting trees to the ground in relation to the existing overhead line at Hintlesham Woods SSSI.</p> <p>The Applicant notes that it can be difficult to discourage browsing by deer without causing barriers to other species. It is also noted that the vegetation beneath the existing 400kV has successfully established without such measures, following the re-conductoring works in 2013, which were similar to the works proposed on the project at this location.</p> <p>Paragraph 9.1.4 of the LEMP (<b>document 7.8(B)</b>) states that checks will also be made to identify the success of protective measures to avoid browsing by deer and rabbits to see if additional management measures are required to encourage growth and development of the reinstatement planting.</p>
3.6 and WE-NE10	Arger Fen SSSI	<p>Natural England considers that it is important to include Arger Fen SSSI in the groundwater dependent terrestrial ecosystem (GWDTE) assessment as a matter of completeness in detailing the assessment, and not an identification of an impact.</p>	<p>Table 7.4 of ES Chapter 7: Biodiversity [<b>APP-075</b>] concludes that there is no groundwater pathway to Arger Fen SSSI, and therefore the Applicant maintains that Arger Fen SSSI does not need to be included in the GWDTE assessment.</p>
3.7 WR-NE11	Little Blakenham Pit SSSI	<p>The Applicant's comments on Relevant Representations do not fully address the issue raised by Natural England of impacts on the population of barbastelle that might be considered an interest feature of Little Blakenham Pit SSSI. Natural England Wildlife Licensing Service will review the information provided in the previous draft licence</p>	<p>Noted – the Applicant has no further comment to make on this matter until after Natural England's Wildlife Licensing Service has undertaken its review.</p>

Reference Matter	Points Raised	Applicant's Comments
	application and provide comment on the conclusions reached in relation to the SSSI in due course.	
<b>4 Protected Species</b>		
4.1 – 4.3 WR-NE14 WR-NE15	Bats and badger  Natural England has received submission of draft protected species licence applications for bats and badger and has been able to issue a LONI with caveats for bats and badger.	Noted – the Applicant has no further comment to make on this matter. This is listed under the matters agreed in the Statement of Common Ground with Natural England submitted at Deadline 3 ( <b>document 7.3.2 (B)</b> ).
4.4 WR-NE16	Dormouse  The Applicant has resubmitted a draft protected species licence application for Dormouse, that was received by Natural England on 26 September 2023. The revised application will be reviewed and our position will be updated in due course.	Noted – discussions are ongoing between the Applicant and Natural England regarding the content of the draft protected species licence application for dormouse. An update on this will be submitted into Examination at a future deadline.
<b>5 Biodiversity Net Gain Provision</b>		
5.1 – 5.2 WR-NE17	Biodiversity Net Gain (BNG) Provision  Natural England's position regarding provision of BNG has changed since our Relevant Representations [ <b>RR-042</b> ]. In summary: <ul style="list-style-type: none"> <li>It is acknowledged that BNG will not be mandatory for Nationally Significant Infrastructure Projects until 2025, and as such Natural England welcomes National Grid's commitment to delivering 10% BNG on this project.</li> <li>Natural England acknowledge that the Applicant has stated that they have included all land within the redline boundary in their calculations for BNG. We welcome their continued work towards achieving 10% BNG for river and stream units and satisfying trading rules.</li> </ul>	Noted – the Applicant has no further comment to make on this matter.



Reference Matter	Points Raised	Applicant's Comments
<b>6 Nationally Designated Landscapes</b>		
6.1 - 6.4 WR-NE18	Dedham Vale Area of Outstanding Natural Beauty (AONB)	<p>Natural England's position regarding nationally designated landscapes has changed since the submission of our Relevant Representations [RR-042].</p> <p>The Applicant has provided further information allowing for a full assessment of the project's effect on the special qualities of the AONB for both the construction and operational phases, and Natural England is satisfied with the information provided.</p>
6.5 WR-NE19	Setting of Dedham vale AONB	<p>The Applicant has addressed Natural England's queries around 'the setting' of the AONB and we welcome the ongoing discussion of this topic between the Applicant and the AONB Partnership.</p> <p>Noted - discussions between the Applicant and the AONB Partnership are ongoing.</p>
6.6 WR-NE20 and WR-NE21	LVIA Methodology	<p>Natural England are satisfied with the further information the Applicant has provided to provide clarity on the Landscape and LVIA Methodology.</p> <p>Noted – the Applicant has no further comment to make on this matter.</p>
6.7	Nationally Designated Landscapes	<p>The Applicant has provided a response to Natural England's comments on hedgerow protection and lighting, which we accept and advise that the mitigation measures described should be secured by appropriate planning conditions.</p> <p>Please confirm the time of year and frequency at which these inspections will take place. We would expect, as an absolute minimum that regenerating hedgerows would be inspected at the beginning and end of each growing season for the first five years of regeneration.</p> <p>Noted – the Applicant addresses specific comments below.</p> <p>In terms of the time and year and frequency of inspections, paragraph 9.1.2 of the LEMP (<b>document 7.8 (B)</b>) states that periodic checks will be undertaken by a suitably experienced professional to check reinstatement and to replace species that have not taken. This would be undertaken as part of the five-year aftercare period for all reinstatement and mitigation planting, as per LV03 in the CoCP (<b>document 7.5.1(B)</b>).</p> <p>The LEMP and CoCP are both secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>).</p>

Reference	Matter	Points Raised	Applicant's Comments
6.7 and WR-NE22	Root protection of hedgerows	<p>The Applicant has responded to Natural England's comments on this issue and says that the 'typical detail' for hedgerow protection matting won't be available until after the examination when the main works contractor is appointed, which Natural England accepts.</p> <p>In due course, Natural England would expect that the 'typical detail' for hedgerow protection matting, will be secured by way of a planning condition to ensure that hedgerows are adequately protected during the construction phase.</p> <p>Adequate protection for hedgerow roots left in-situ must be secured through planning conditions requiring detailed drawings of the proposed root protection. This is to ensure that hedge roots are adequately protected such that hedgerow regeneration is viable.</p>	<p>Table 7.9 in ES Chapter 7: Biodiversity [<b>APP-075</b>] provides a summary of the impacts in hedgerows. Paragraphs 7.6.60 -61 state that approximately 42m would be lost permanently at five locations. Once planting has matured, the impact of the combination of works on the hedgerows would be of small magnitude in the short term, resulting in a minor adverse effect, reducing to a neutral once the hedgerow vegetation had established which would be not significant.</p> <p>Paragraph 6.4.2 of the LEMP (<b>document 7.8 (B)</b>) states that hedgerows that do not require removal during the works would be appropriately protected during construction. This may include suitable fencing to provide a buffer which protect the rootzone from trafficking. Paragraph 7.3.1 and 7.3.2 also state that where hedgerows are coppiced to ground level, matting will be placed over the soil to protect the roots. The Applicant also notes that in accordance with LV03 that a five-year aftercare period would be established for all reinstatement and mitigation planting. Therefore, any hedgerows not establishing would be identified through the period checks to replace species that have not reinstated or taken. The LEMP and CoCP are secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>).</p> <p>Based on the above, the Applicant considers that it is not a requirement of the project to provide detailed drawings of the proposed root protection to Natural England.</p>
WR-NE23	Hedgerow inspections	<p>Please confirm the time of year and frequency at which these inspections will take place. We would expect, as an absolute minimum that regenerating hedgerows would be inspected at the beginning and end of each growing season for the first five years of regeneration. The time of year and frequency at which regenerating hedgerow inspections will take place must be secured through planning conditions.</p>	<p>The timing of the landscape checks would be set out by the landscape contractor on the project. These would typically be held at the beginning and end of each growing season to check that vegetation is re-establishing as planned. However, the frequency of visits would also depend on other factors such as the type of planting and also the weather.</p> <p>The Applicant has set out the aftercare arrangements within Chapter 9 of the LEMP (<b>document 7.8(B)</b>) including the need for period checks. Based on this, the Applicant does not consider there to be a need to secure further details on the time of year or frequency of visits in the DCO.</p>
WR-NE24	Lighting	<p>Compliance with best practice guidance issued by the AONB should be secured via planning conditions to minimise adverse landscape effects arising from lighting within the highly sensitive AONB landscape and its setting</p>	<p>As stated in Table 4.8 of ES Chapter 4: Project Description [<b>APP-072</b>], operational lighting would be limited to security lighting at the GSP substation and therefore would not affect the AONB.</p> <p>Section 6.4 of the CEMP (<b>document 7.5(B)</b>) sets out the measures in relation to lighting during construction. The Applicant considers that the measures set out in this CEMP already align with the lighting guidance issued by the AONB Partnership. Based on this, the Applicant considers that no further measures are required.</p>

Reference Matter	Points Raised	Applicant's Comments
<b>Soils and Best and Most Versatile (BMV) Agricultural Land</b>		
7.1 - 7.3 WE-NE27 WE-NE31	<p>Soil Management Plan (SMP)</p> <p>Natural England's position regarding soils and the best and most versatile agricultural land has changed since submission of our Relevant Representations [RR-042].</p> <p>Whilst it is acknowledged that soil management measures have been included in the CEMP, it is still Natural England's advice that a clearly defined and detailed SMP should be provided. However, this does not need to be a separate document and can be included in the CEMP. This should be:</p> <ul style="list-style-type: none"> <li>● Prepared pre consent</li> <li>● Informed by site-specific soil information to inform suitable soil handling and restoration and include an aftercare programme which would enable a satisfactory standard of agricultural after-use to be reached, with regards to cultivating, reseeding, draining or irrigating, applying fertiliser, or cutting and grazing the site.</li> <li>● Set out the target specification for the proposed end uses. The target specification for the restored soils should be based on pre-construction ALC grade.</li> <li>● Reconditioning methodology and the separate handling and storage methodology of soils which may be plastic, however, every effort should be made to avoid this scenario.</li> </ul>	<p>The Applicant has added a sentence at the start of Section 11: Agriculture and Soils in the CEMP (<b>document 7.5 (B)</b>) for clarity, stating that the chapter '<i>fulfils the purpose of and contains all of the necessary measures that would be set out in a standalone Soil Management Plan.</i>' As the necessary information is provided in the CEMP, the Applicant considers that a separate SMP is not required.</p> <p>In terms of the specific bullets:</p> <ul style="list-style-type: none"> <li>● The soil management measures have been set out in Chapter 11 of the CEMP (<b>document 7.5 (B)</b>).</li> <li>● AS10 in the CoCP (<b>document 7.5.1 (B)</b>) commits to undertaking soil surveys and using this data to support the development of detailed soil management measures including handling, movement and reinstatement of soil during construction. Paragraphs 11.3.34 to 11.3.41 of the CEMP (<b>document 7.5(B)</b>) set out the reinstatement measures and aftercare in relation to soils.</li> <li>● In terms of target specification, paragraph 11.3.41 states that the aftercare period will commence after soil characteristics required to achieve the reinstatement standard have been achieved. This means that the land is brought as close as practically possible to its physical state before construction.</li> <li>● Paragraph 11.3.37 of the CEMP states that prior to subsoil and topsoil placement the area will be assessed for evidence of compaction and any compaction will be relieved through a suitable method such as ripping to an appropriate depth and at an appropriate spacing to remove all compaction. Ripping or other methods will only be undertaken when the soils are in a non-plastic state to ensure the ripping operation does not result in smearing and additional soil compaction.</li> </ul>

Reference	Matter	Points Raised	Applicant's Comments
7.4 and WR-NE25, WR-NE36	Soil surveys	<p>Natural England does not consider that the issues raised have yet been fully addressed in relation to the survey work expected before construction and also our advice on soil handling.</p> <p>A detailed ALC and soil survey of the agricultural land should be undertaken across the full study area to inform the EIA. This should normally be at a detailed level, e.g. one auger boring per hectare, supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2m.</p> <p>Soil data collected as part of an ALC survey can also be used to inform the soil resource and management plan as set out in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. All land which may experience temporary or permanent disturbance should be subject to a detailed ALC survey, to inform suitable handling and restoration.</p>	<p>As reported in ES Appendix 11.1: Agricultural Land Classification (ALC) Survey [APP-133], soil surveys have been undertaken at the locations where there would be permanent impacts to soil i.e. the CSE compounds and the GSP substation. The locations of the field surveys are shown on ES Figure 11.3: Detailed ALC Mapping [APP-153]. As stated in paragraph 2.3.5 [APP-133], the soil surveys were carried out at a density of approximately one auger per hectare in accordance with published guidelines (MAFF, 1988).</p> <p>In addition, AS10 in the CoCP (<b>document 7.5.1 (B)</b>) commits to undertaking soil surveys and using this data to support the development of detailed soil management measures including handling, movement and reinstatement of soil during construction. Paragraphs 11.3.34 to 11.3.41 of the CEMP (<b>document 7.5 (B)</b>) set out the reinstatement measures and aftercare in relation to soils.</p> <p>As ES Chapter 11: Agriculture and Soils [APP-079] has been based on a worst case for ALC grade, whereby BMV has been assumed for all Grade 3 land where detailed surveys have not been undertaken. Undertaking detailed soil surveys in the EIA would not change the conclusions of the assessment.</p>
7.5 and WR-NE25 and WR-NE26	Permanent loss of soil	<p>Natural England notes the Applicant's comments on our Relevant Representations (NE24) and advises permanent loss is recorded in the ES. The ES should clearly demonstrate how the master planning has considered the ALC grades and avoided BMV where possible in line with paragraph 5.10.8 of the Draft NPS EN1.</p>	<p>ES Chapter 3: Alternatives Consider [APP-071] sets out the different factors that have been considered during routing of the project and the difficulty in avoiding BMV land within the study area, when almost all land is identified as BMV land. ES Chapter 11: Agriculture and Sol [APP-079] notes that the permanent land take associated with the CSE compounds and the GSP substation are 1.68ha and 1.5ha respectively, which means that there is a very small permanent impact on BMV.</p>
WR-NE29	Soils and Best and Most Versatile Agricultural Land	<p>Natural England advise that the Applicant should provide simple breakdowns in this summary for each of the individual components. For example, total agricultural area impacted by the project (split by scheme component and by ALC grade), total area of</p>	<p>The ALC assessment presented in ES Chapter 11: Agriculture and Soil [APP-079] is based on the overall impact of all aspects of the project on BMV land. This concludes that there would be temporary effects on BMV land during construction due to soil stripping, but that there would be no significant effects on BMV land during operation as the majority of land would be restored to its pre-construction use. The extent of land required permanently is limited and does not result in a significant effect.</p>

Reference	Matter	Points Raised	Applicant's Comments
		BMV agricultural land (split by component) and total BMV agricultural area permanently and temporarily required for the development (split by component).	As no significant effect of the project on BMV land has been identified, there would not be a significant effect as a result of any specific component. Therefore, the Applicant does not consider that a table showing the breakdown of ALC grades split by component is required to support the application for development consent.
WR-NE32	Soil handling	Soil handling should normally be avoided during October to March inclusive, irrespective of soil moisture conditions, because it will generally not be possible to establish green cover over winter to help dry out soils and protect them from erosion.	Restricting soil stripping to the proposed months would mean that the project would not be able to deliver to the required programme. In addition, it would likely mean that areas would be soil stripped for longer than necessary. The Applicant considers that the measures set out in Chapter 11 of the CEMP ( <b>document 7.5 (B)</b> ) are already sufficient to protect soil during construction.

### Ancient Woodland and Ancient/Veteran Trees

8.1 - 8.3 WR-NE37	Ancient Woodland and Ancient/Veteran Trees	<p>Natural England's position regarding ancient woodland and ancient/veteran trees has not changed since submission of our Relevant Representations [<b>RR-042</b>].</p> <p>The Applicant has advised Natural England that we will be provided with a technical note on proposals at each ancient woodland within 15m of the Order Limits. Once reviewed, Natural England will be able to provide further comment of whether the issues raised in our Relevant Representations have been fully addressed.</p>	The Applicant has submitted a Technical Note on Ancient and Potential Ancient Woodland ( <b>document 8.5.12</b> ) at deadline 3. This sets out details for each specific ancient woodland and potential ancient woodland, the works involved and any measures required to reduce the effects of the works on the woodland. The Applicant welcomes feedback from Natural England on this technical note.
----------------------	--	---	---

### Connecting people with nature (National Trials, open access land and England Coast Path)

9.1 - 9.4 and WR-NE38	Habitats of Principal Importance (HPI)	Natural England notes the Applicant's response on Relevant Representations, which sign posts where summaries of HPI information can be found in the application documents. However, they have not provided a summary table of the total area of all HPI that will be lost, both permanently and temporarily, alongside the total area of proposed mitigation for each HPI.	The Applicant has provided a table of HPI affected by the project in the Applicant's Responses to First Written Questions: EC1.3.3 ( <b>document 8.5.4</b> ).
--------------------------	--	--	---

Reference	Matter	Points Raised	Applicant's Comments
9.5	Landscape and Ecological Management Plan (LEMP)	Natural England acknowledge and accept the Applicant's comments on Relevant Representation on the issues raised by Natural England on the aftercare plan detailed in the LEMP, use of herbicides outlined in the LEMP, and the measures set out in the LEMP to ensure naturally regenerated woodland is establishing satisfactorily.	Noted – the Applicant has no further comment to make on this matter.

## 2.10 Network Rail Infrastructure Limited [REP2-028]

Table 2.10 – Network Rail Infrastructure Limited [REP2-028]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Protective Provisions	Network Rail requires protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with the relevant safety standards	Protective Provisions for the benefit of Network Rail are included in the draft DCO [REP2-004]. The Applicant and Network Rail are currently in discussions to try to reach agreement on an updated form of Protective Provisions through their respective legal representatives.
N/A	Protection of Network Rail's assets	Network Rail requires a private agreement to regulate the manner in which rights over railway property are to be granted and in which works are to be carried out in order to safeguard Network Rail's statutory undertaking. Engineers for Network Rail are continuing to review the extent of impacts on operational railway and Network Rail property and any mitigation required (including Network Rail's review and prior approval of the design proposals for the parts of the project which interface with the railway at detailed design and construction stages) will be considered in this agreement	The Applicant and Network Rail have held meetings to discuss the interface between their assets and the project to outline a hierarchy of measures to manage these construction interfaces. These are detailed in the draft SoCG Network Rail Infrastructure Ltd. ( <b>document 8.5.6.3 (B)</b> ) between both parties and have been sent to Network Rail to be reviewed; the Applicant is awaiting a response on this review.

Reference	Matter	Points Raised	Applicant's Comments
N/A	Land agreements	The completion of the necessary deeds of easement and asset protection agreement to govern the construction, maintenance and, where appropriate, removal of the parts of the development proposed by the DCO which are located on or adjacent to operational railway land.	<p>The Applicant and Network Rail have held meetings to discuss the interface between their assets and the project to outline a hierarchy of measures to manage these construction interfaces. These are detailed in the draft SoCG Network Rail Infrastructure Ltd. (<b>document 8.5.6.3 (B)</b>) between both parties and have been sent to Network Rail to be reviewed; the Applicant is awaiting a response on this review.</p> <p>The SoCG, together with the Protective Provisions should allow for adequate protection of Network Rail assets, therefore the Applicant does not consider it is necessary to make any changes to the project located under, over or in close proximity to operational railway land. The works proposed are the minimum required to cross the railway safely with minimal impact on the operations of the railway.</p>

## 2.11 Pivoted Power LLP [REP2-029]

Table 2.11 – Pivoted Power LLP [REP2-029]

Reference	Matter	Points Raised	Applicant's Comments
WR-012-001	Interface co-ordination	Interface between the Applicant and Pivoted Power at an existing track over which Pivoted Power has rights of access under the terms of its Lease	<p>At the point at which the Applicant undertook land referencing to inform the Book of Reference (<b>document 4.3 (C)</b>) Pivoted Power LLP did not have a completed lease and hence was not identified as a Person with an Interest in Land.</p> <p>Both the Applicant and Pivoted Power LLP benefit from rights of access in common over the access road, and therefore are agreed that an Interface Agreement is necessary in order to make provision for ensuring that access rights are maintained over the section of shared access road running between the public highway at Bullen Lane and the Applicant's Bramford Substation site, for the benefit of both the project and Pivoted Power LLP's Bramford Battery Energy Storage System project.</p> <p>Heads of Terms (HoT) have been agreed, and the Applicant has now issued a draft of the Interface Agreement to Pivoted Power LLP's legal representatives. It is anticipated that a resolution will be found by the close of examination.</p>

## 2.12 Royal Mail [REP-030]

Table 2.12 – Royal Mail [REP2-030]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Royal Mail's position	<p>Royal Mail supports this proposed electricity line reinforcement project, but is seeking to secure reasonable mitigations to protect its road based operations during construction. Royal Mail gives details of its operational properties within 30 miles of the project.</p> <hr/> <p>In exercising its statutory duties, Royal Mail vehicles use all local roads on a daily basis for access to the Delivery Offices and for deliveries. Any periods of road congestion, disruption / closure, night or day, on the surrounding highway network will have the potential to adversely impact Royal Mail operations.</p>	<p>The Applicant notes these points.</p> <hr/> <p>The Transport Assessment [APP-061] demonstrates that there would be no substantial adverse impacts upon the transport network. Traffic generated would be limited and the impacts would be temporary during the construction phase of the project. Taking into account the embedded measures and the good practice measures outlined in the CoCP (<b>document 7.5.1 (B)</b>), the Transport Assessment [APP-061] accompanying the application concludes that, the project is not anticipated to have a substantial impact on the transport network during construction.</p>
N/A	Requested mitigation	<p>1. The DCO includes specific requirements that during the construction Royal Mail is notified at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final CTMP</p> <hr/> <p>2. The final CTMP includes a mechanism to inform major road users about works affecting the local highways network.</p> <p>An example of wording has been provided: 'Advance notifications of programmed diversions and closures will be issued to</p>	<p>The Applicant does not consider that this request needs to be addressed through a specific Requirement in the DCO. Instead, the Applicant has added the following paragraph to 5.4.13 of the CTMP submitted at Deadline 3 (<b>document 7.6 (B)</b>):</p> <p><i>Advance notifications of programmed diversions and closures will be issued to major road users and businesses, including Royal Mail. This will include providing notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and the agreed hours of working at least one month prior to works taking place.</i></p> <p>The CTMP is secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>).</p> <hr/> <p>As noted in the point above. The Applicant has included additional wording in the CTMP submitted at Deadline 3 (<b>document 7.6 (B)</b>) to cover notifying major road users about the work.</p>



Reference Matter	Points Raised	Applicant's Comments
	<p><i>Royal Mail. This would include providing not less one month notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and the agreed hours of working. The method of communication would be agreed as part of the Traffic Management Plan which is submitted to the Secretary of State for approval.'</i></p>	
	<p>3. Requests that Royal Mail is invited to join any stakeholder traffic management consultation group that is set up during the operational phase.</p>	<p>As stated in Section 1.3 of the Transport Assessment [APP-061], all components of the project would be unmanned during operation and inspections of the line would typically be on an annual basis using lights good vehicles. Therefore, operational traffic movements would be limited and were scoped out of the assessment. On this basis, the Applicant does not consider there to be a need to set up a stakeholder traffic management consultation group during the operational phase for this project.</p>

## 2.13 Suffolk Preservation Society [REP2-031]

Table 2.13 – Suffolk Preservation Society [REP2-031]

Reference Matter	Points Raised	Applicant's Comments
3.1-3.2	Hintlesham Hall	The Suffolk Preservation Society (SPS) describe the significance of Hintlesham Hall and provide examples taken from the historic mapping.
3.3	Impact on key views	<p>The proposed power lines will principally affect views from the historic core of the site towards the north-west and round to the west. The tree belt historically known as Square Pastures is located to the north of the existing and proposed pylons, and will therefore not soften the landscape impact of the pylons when viewed from the vicinity of the Hall. Views south-west from the principal front of the Hall</p>
		<p>The Applicant notes that this information aligns with the desk study information that it reviewed when assessing the sensitivity of the baseline environment, as presented in ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128].</p> <p>The view to the north-west of the Hall is captured by HV01 in the Photomontages [APP-063]. Paragraph 4.3.9 of ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128] states that from this viewpoint, the pylons and overhead line from the Proposed Alignment are barely visible, despite the pylon height and scale.</p> <p>The view from the front of the Hall is captured in AB20 in the Photomontages [APP-063]. Paragraph 4.3.9 of ES Appendix 8.2: Annex A Hintlesham Hall Assessment</p>

Reference	Matter	Points Raised	Applicant's Comments
		are less affected as existing tree belts and areas of woodland obscure all but the tops of the pylons in the far distance.	<p>[APP-128] states that from this viewpoint, the addition to the skyline is minimal over the existing overhead line.</p> <p>The assessment concludes that the proposed 400kV overhead line does not distract from the assets of the Hall and ancillary buildings from the two viewpoints given.</p>
3.3	Cumulative effects	<p>SPS acknowledges that the existing 400kV overhead line is unsympathetic to the setting of the Hall and its ancillary buildings but is concerned that the addition of a second overhead line, considerably closer to the designated assets, will have the cumulative impact of increasing the visual intrusion. Good Practice Advice 3 (Historic England, 2017) provides guidance on cumulative change.</p> <p>ES Appendix 8.2: Annex A Hintlesham Hall Assessment, concludes that Hintlesham Hall and its ancillary buildings are high value heritage assets and that the project would result in a loss of heritage significance.</p> <p>SPS agrees with these findings and further agrees that the proposals would not constitute substantial harm. However, the cumulative impact and potential loss of significance resulting from the introduction of an additional 400kV pylon line is not fully recognised by the applicant and we urge that additional mitigation to reduce the impact of the proposals on these important heritage assets is delivered.</p>	<p>The Applicant considered the guidance set out in Good Practice Advice 3 (Historic England, 2017) when undertaking the assessment.</p> <p>The Applicant has identified an adverse effect from the addition of another overhead line in the vicinity of the existing one, which is addressed in paragraphs 4.3.7 and 4.3.8 in ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128]. This acknowledges that a cumulative change to setting would occur from the proposed 400kV overhead line in conjunction with the existing 400kV overhead line.</p> <p>The parallel overhead lines would pass through a zone which has changed in character since the mid-20th century, with the loss of formal parkland features via reversion to arable fields. The existing 400kV overhead line can be regarded as unsympathetic to the Hall and its setting. The addition of a second overhead line in parallel to the existing baseline could also be regarded as unsympathetic. However, it would not sever the link between the Hall and its setting, despite adding to the visual intrusion within a portion of the historic parkland, leading to a small amount of additional visual intrusion to the Hall and its ancillary buildings.</p> <p>The assessment presented in Table 4.2 of ES Appendix 8.2: Historic Environment Impact Assessment [APP-127] concludes that the addition of the proposed 400kV pylon on the setting of Hintlesham Hall would be minor adverse (not significant). Therefore, no additional mitigation has been proposed. However, enhancement planting has been proposed as outlined in the response to 3.4 below.</p>
3.4	Mitigation and enhancements at Hintlesham Hall	In accordance with the Historic England guidance, this project should be viewed as an opportunity to enhance the significance of the asset. SPS therefore call for greater compensatory mitigation measures in terms of an enhanced planting scheme which effectively filters views of the wirescape, and it	As the assessment presented in Table 4.2 of ES Appendix 8.2: Historic Environment Impact Assessment [APP-127] concluded that the effects on the setting of Hintlesham Hall would be minor adverse (not significant), no additional mitigation (or compensation) has been proposed. However, the Applicant is proposing landscape softening planting to the north of the hall, which would comprise reinforcement planting along the existing hedgerow (MM04) to help soften views of the overhead line from the Hall. This planting is shown on LEMP Appendix B: Vegetation

Reference Matter	Points Raised	Applicant's Comments
	<p>considers that the current proposed planting falls some way short of this aspiration.</p> <p>The only proposed additional mitigation measure in the Hintlesham area is hedgerow planting (MM06) which aims to benefit properties along the A1071. The Applicant has not recognised any requirement for additional mitigation planting around Hintlesham Hall. It is unclear why the area identified as MM04 is described as additional planting only which is defined as landscape softening and biodiversity compensation. A sparse row of trees and scrub already exists on this section and no detailed plans are provided on how the proposals will improve on this. SPS would urge for a degree of reinstatement of closely-planted trees along the east/west access track, the precedent for which is shown on the historic maps of Hintlesham Hall's parkland.</p>	<p>Reinstatement Plan (<b>document 7.8.2 (B)</b>). LEMP Appendix C: Planting Schedules [<b>APP-185</b>] provides details on the planting mixes proposed.</p> <p>In addition, the Applicant is proposing to enhance the parkland by partially restoring the tree-lined avenue that extended to the south-west of the Hall. This was a major landscape feature of the original historic parkland. This enhancement (ENV02) is described further in the Environmental Gain Report [<b>APP-176</b>].</p>
3.5	<p>Limits of Deviation at Hintlesham Hall</p> <p>SPS is concerned that the proposed LoD could alter the resulting landscape and visual effects and urge that the final alignment, including the micro-siting of pylons in sensitive locations such as close to Hintlesham Hall, is more tightly controlled.</p> <p>Where pylon positions have been previously agreed with Historic England, any changes and deviation should only be made with their agreement. The Applicant argues that Hintlesham Hall and its ancillary buildings would not experience any significant change in their value, irrespective of the final alignment chosen within the LoD. This is of concern as SPS considers that the alignment of the new pylons, in conjunction with the existing line from particularly important viewpoints within</p>	<p>The Hintlesham Hall Assessment [<b>APP-128</b>] took into account the worst-case scenario taking into account the flexibility provided by the LoD. As set out in paragraph 4.4.2 and 4.3.12 respectively of ES Appendix 8.2: Annex A Hintlesham Hall Assessment [<b>APP-128</b>], any changes to the overhead line or changes to the pylon locations within the LoD would result in a change so marginal as to not influence the effects identified within the assessment.</p> <p>The Final Alignment of the overhead line including the pylons would be subject to a range of factors including the required distances between spans, local features such as roads and other services, as well as the local topography (which will also affect the final pylon height at any given location). Further considerations also include the need for a safe clearance space beneath the conductors and an allowance for the maximum distance within which conductors can swing in high winds (which is up to 30m either side of the centre line). This is shown on the figure in Appendix A of the Applicant's Response to Issue Specific Hearing 1 Action Points [<b>REP1-034</b>].</p> <p>Due to the presence of the existing 400kV overhead line and the need to maintain an 85m offset between the existing and the proposed overhead line and also allowing for</p>

Reference Matter	Points Raised	Applicant's Comments	
	<p>the environs of the Hall, will be key to the resulting degree of visual impact.</p> <p>SPS consider that the placement of the pylons should be agreed with Historic England at this stage to enable a reliable assessment of the visual and heritage impacts of the proposals which will not change after the DCO has been granted.</p>	<p>maximum conductor swing, there is very little flexibility to move the pylons within the horizontal LoD (approximately 20m at this location).</p> <p>In addition, and in response to the feedback from Historic England, the Applicant has limited the longitudinal LoD to the north of Hintlesham Hall through updating the wording of EM-AB01 in the REAC at Deadline 3 (<b>document 7.5.2 (B)</b>). The additional wording states:</p> <p><i>'In utilising the LoD, National Grid will not position a pylon between the access track to Kennels Cottage (608112, 244204) and 100m to the south-west of the track (608027, 244151) in order to avoid its visibility in key views from the Grade II* listed ancillary buildings located to the north of Hintlesham Hall, which comprise the converted service ranges, stables, coach house and brewhouse.'</i></p> <p>The Applicant is awaiting Historic England's feedback on the updated wording with the intention of providing an update as part of the Statement of Common Ground.</p>	
3.6	Statutory Duties	<p>National Planning Statement (NPS) EN-5: Electricity Networks Infrastructure, is relevant to the provision of mitigation in order to reduce or offset the harmful impact of electricity infrastructure development. SPS note that Schedule 9 to the Electricity Act 1989, places a duty on all transmission and distribution licence holders to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ... do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p>	<p>Appendix B of the Planning Statement [<b>APP-160</b>] sets out how the Applicant is compliant with NPS EN-5. The Applicant's published Schedule 9 Statement (2016) sets out how the company would meet the duty placed upon it by the aforementioned legislation. Further details on how the Applicant is meeting its duties under the Electricity Act are also presented in the Planning Statement.</p>

## 2.14 The Woodland Trust [REP2-032]

Table 2.14 – The Woodland Trust [REP2-032]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Impact to woods and trees	The Trust objects to the proposed route alignment on the basis of direct loss of a veteran oak tree (T378).	<p>T378 has been identified as a veteran tree (Grade A) as part of the arboricultural surveys undertaken for the project. This is recorded in the Arboricultural Impact Assessment [REP1-001/012] at paragraph 4.2.3 and 5.1.2. It is also shown on Sheet 9 of 14 and in Table A1 in Appendix A: Arboricultural Survey Data (page 20). This veteran tree lies within the centre of the Order limits in an underground cable section of the project. Its removal is required due to the necessary width of the cable working area, as shown on the Design and Layout Plans Cable Working Cross Section [APP-027].</p> <p>In accordance with paragraph 5.3.14 of NPS for Energy (EN-1), the Applicant acknowledges that veteran trees are valuable and therefore has given the reason why this particular tree cannot be avoided during the implementation of this nationally significant infrastructure project. All other veteran trees within the Order Limits would be retained.</p>
N/A	Impact to woods and trees	<p>The Trust has concerns regarding potential deterioration of ancient woodland habitats which are adjacent to the proposed LoD for new infrastructure (including the proposed substation). Of particular concern are the following woodlands:</p> <ul style="list-style-type: none"> <li>• Tom's/Broadoak Wood CWS (grid reference: TM0565241446)</li> <li>• Butler's Wood (grid reference: TL8434837366)</li> <li>• Waldegrave Wood (grid reference: TL8439637018)</li> <li>• Broom Hill Wood CWS (grid reference: TL9787338961)</li> </ul>	<p>The Applicant considers that it has appropriate measures in place for managing the impacts to ancient woodland. Paragraph 7.6.15 in ES Chapter 7: Biodiversity [APP-075] concludes that overall, the commitments to reduce impact upon the high valued ancient woodland habitat would result in a temporary small magnitude impact in the short term, resulting in a minor adverse effect, reducing to a neutral effect once the coppiced vegetation has re-established, which would be not significant. Further evidence supporting this conclusion has been provided by the Applicant at Deadline 3 in the Technical Note on Ancient and Potential Ancient Woodland (<b>document 8.5.12</b>).</p>

Reference	Matter	Points Raised	Applicant's Comments
N/A	Ancient Woodland	Both Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS) are given equal protection in government's National Planning Policy Framework regardless of the woodland's perceived condition, its size, or features it contains.	The Applicant notes that paragraph 1.2.2 in ES Appendix 7.4: Ancient Woodland and Potential Ancient Woodland Report [ <b>APP-114</b> ] defines ancient woodland as any area that's been wooded continuously since at least 1600 AD and includes ASNW and PAWS.
N/A	Planning Policy	The Woodland Trust provides extracts from relevant planning policy relevant to veteran trees and ancient woodland.	The Applicant has no comment to make on these references.
N/A	Impact and mitigation for ancient woodland	<p>The Woodland Trust is specifically concerned about the following potential impacts to ancient woodlands that are adjacent to the proposed new transmission infrastructure:</p> <ul style="list-style-type: none"> <li>• Permanent fragmentation due to the removal of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats if continued access to the transmission line once constructed is required.</li> <li>• The impacts of noise and dust pollution to woodland within close proximity of the transmission installation.</li> <li>• Trampling of sensitive ancient woodland flora and soils if access is required within any ancient woodland.</li> </ul>	<ul style="list-style-type: none"> <li>• Fragmentation: There is no permanent loss or fragmentation of ancient or designated ancient woodland as a result of the project (also see response to line relating to impacts on trees and woodland above).</li> <li>• Noise: The Applicant notes that noise would not have an impact on ancient woodland habitat but on the species that live within the woodland such as bats and breeding birds. Construction noise impact on ecological receptors is assessed within Chapter 7: Biodiversity [<b>APP-075</b>] with regards to species using areas of woodland, including breeding birds (paragraphs 7.6.24 to 7.6.28 and 7.6.136 to 7.6.140), bats (paragraphs 7.6.125 to 7.6.128) and dormice (paragraphs 7.6.150 to 7.6.151). The assessment concluded that there would be no significant effects to protected species due to noise. Further work has been undertaken by the Applicant in relation to peak sound at Hintlesham Woods SSSI and the results of this are presented in the Technical Note on Noise Levels at Hintlesham Woods (<b>document 8.5.12</b>) submitted at Deadline 3.</li> <li>• Dust: Table 7.1 of ES Chapter 7: Biodiversity [<b>APP-075</b>] scopes out the effects of dust on the project as ES Appendix 13.1: The Dust Risk Assessment [<b>APP-135</b>] concludes that with the application of good practice measures within the CoCP (<b>document 7.5.1(B)</b>), there are no likely significant effects in relation to construction dust to ecological receptors.</li> <li>• Trampling of ancient woodland flora and soils: The Applicant has committed to embedded measures within the REAC (<b>document 7.5.2 (B)</b>) for works within areas of designated ancient woodland or potential ancient woodland (PoAWS) which would limit the effects on ancient woodland flora and soils:</li> </ul>

Reference Matter	Points Raised	Applicant's Comments
		<p>Hintlesham Woods SSSI: The Order Limits lie within the existing maintained swathe for the 400kV overhead line. EM-AB13 states that <i>'the temporary access route through Hintlesham Woods SSSI will use protective matting (such as trackway) to facilitate works to the existing overhead line and will be microsited using data gathered during the arboricultural and habitat surveys within the 20m coppiced area'</i>.</p> <p>Hintlesham Woods (PoAWS5) tree belt to the north of Hintlesham Woods: EM-AB05 states that <i>'The tree belt to the north of Hintlesham Woods (PoAWS5) will be retained other than at a 5m gap where the proposed temporary access route will cross the tree belt. Soil from the PoAWS5 will be stored separate to general soil storage so that it can be replaced at PoAWS5, where soil is suitable for reuse (for example, not contaminated).... Soil storage and reinstatement would aid re-establishment of existing ground flora'</i>.</p> <p>Ansell's Grove (PoAWS10): The Order Limits lie within the existing maintained swathe for the 400kV overhead line, which would be removed as part of the project. EM-G07 states that <i>'the 400kV overhead line would be removed at Ansell's Grove/Ash Ground LWS... construction activities will be confined to the existing operational maintenance swathe. The conductors will be lowered down and pulled out. Light vehicles will use existing tracks within the woodland.'</i> EM-G11 states that <i>'the temporary construction works ...will be limited to the existing operational maintained swathe within the woodland. There will be no temporary access route installed and no vehicle access will be required within the woodland.'</i></p>
N/A	Edge effects	<p>Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts. Natural England and Forestry Commission have also produced guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice.</p> <p>Table 6.1 of the LEMP (<b>document 7.8 (B)</b>) outlines the mitigation hierarchy proposed in relation to ancient and potential ancient woodland in terms of root protection areas (RPA). The Natural England and Forestry Commission's Standing Advice recommends a buffer of at least 15m, which is what has been used on the project. As stated in Table 4.1 of the LEMP <i>'any effects of the project in relation to other impacts, such as from traffic would be temporary, a 15m buffer is considered an appropriate buffer for avoiding impacts on ancient woodland on the project'</i>. The 15m buffer is considered appropriate to limit effects on ancient and potential ancient woodland, including edge effects.</p>

Reference	Matter	Points Raised	Applicant's Comments
N/A	Additional mitigation	<p>Additional mitigation approaches are also outlined in our Planners' Manual; these measures would help ensure that the development meets policy requirement and guidance and include:</p> <ul style="list-style-type: none"> <li>Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.</li> <li>Measures to control noise, dust and other forms of water and airborne pollution.</li> <li>Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.</li> </ul>	<p>The Applicant considers that the mitigation measure proposed by the Woodland Trust are already included within the management plans that would be secured through Requirement 4 of the draft DCO (<b>document 3.1 (C)</b>):</p> <ul style="list-style-type: none"> <li>Retaining and enhancing natural habitats: ES Chapter 3: Alternatives Considers [APP-071] shows how the option appraisal avoided areas of ancient woodland through design. In addition, mitigation planting around Hintlesham Woods (MM09 and MM10) would provide connectivity between Ramsey Wood and Wolves Wood/ Keebles Grove (components of Hintlesham Woods SSSI). The mitigation planting is secured through the REAC (<b>document 7.5.2 (B)</b>).</li> <li>Measures to control pollution: The good practice measures within the CoCP (<b>document 7.5.1 (B)</b>) would reduce noise, dust and risks of water pollution.</li> <li>Implementation of a monitoring plan: Chapter 9 of the LEMP (<b>document 7.8 (B)</b>) sets out the aftercare arrangements reinstatement and new planting. These include the periodic inspections that would take place to check that vegetation is establishing. Section 10.3 sets out the monitoring proposed at designated sites including Hintlesham Woods SSSI and Ansell's Grove/Ash Ground LoWS, Site inspections would be undertaken at these sites to check whether habitats are returning to their pre-construction condition and to identify whether adaptive measures need to be taken so that these sites achieve the habitat conditions required.</li> </ul>
N/A	Buffer zones for ancient woodland	<p>Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland.</p> <p>This development should allow for a buffer zone of at least 30m to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage.</p> <p>Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.</p>	<p>Table 6.1 of the LEMP (<b>document 7.8 (B)</b>) outlines the mitigation hierarchy proposed in relation to ancient woodland and potential ancient woodland in terms of RPA. The Natural England and Forestry Commission's Standing Advice does not reference 30m for a buffer zone but instead recommends a buffer of at least 15m, which is what has been used in the LEMP. As stated in Table 4.1 of the LEMP '<i>any effects of the project in relation to other impacts, such as from traffic would be temporary, a 15m buffer is considered an appropriate buffer for avoiding impacts on ancient woodland on the project</i>'. In addition, the Arboricultural Impact Assessment [REP-011/012] has identified RPA, based on these, the 15m buffer is considered appropriate to limit effects on arboricultural features.</p> <p>As noted in paragraphs 7.6.15, 7.6.42, 7.7.5, and 7.7.12 of ES Chapter 7: Biodiversity [APP-075], the proposed electricity line would have no significant effects on ancient woodland during operation. Therefore, the Applicant is not seeking rights</p>



Reference Matter	Points Raised	Applicant's Comments
	For example, the effect of air pollution from development that results in a significant increase in traffic.	over additional land, which would increase impacts on landowners, in order to provide a buffer between the electricity line and ancient woodland.
N/A	Fencing and other measures	The proposed upgrade works will require dismantling of existing infrastructure within ancient woodland habitats including Hintlesham Wood SSSI, and therefore sensitive management of these works will be required. HERAS fencing, fitted with acoustic and dust screening measures should be erected along the wayleave edge, and the use of construction vehicles should be restricted wherever possible to outside of the ancient woodland areas.
N/A	Veteran trees	It is essential that no veteran trees are lost as part of the development. We therefore hold serious concerns regarding the loss of T378. The loss of veteran trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees.
N/A	Buffer zones for veteran trees	The Woodland Trust welcomes the Applicant's commitment to provide retained veteran buffer zones in line with Natural England and Forestry Commission's Standing Advice and all works should be maintained outside of this zone for veteran trees which are within proximity to the LoD (T196, T256, T264 and T272). If works near to these trees are required, we would ask that no digging occurs within the RPA as calculated to BS:5837:2012 specifications, and any works within the veteran buffer zone should be undertaken by hand.
N/A	Fencing and other measures	<p>The construction activities within Hintlesham Woods SSSI and also within Ansell's Grove would take place within the maintained swathe beneath the existing 400kV overhead line. These construction activities would also be very similar to those undertaken for the reconductoring that was undertaken by the Applicant on the existing 400kV overhead line within Hintlesham Woods in 2013.</p> <p>It would be impractical to fence the Order Limits with heras fencing through the woods, as this would both increase the duration of the construction within the woods and also create a barrier for species using the woods.</p> <p>Specific commitments have been made in the REAC (<b>document 7.5.2 (B)</b>) to reduce the effects on both woodlands during construction. These include EM-AB02, EM-09 to EM-AB14 for Hintlesham Woods and EM-G07 and EM-G11 in relation to Ansell's Grove.</p>
N/A	Veteran trees	The Applicant has responded to this in the first line item in this table (Impact to woods and trees).
N/A	Buffer zones for veteran trees	<p>Table 6.2 in the LEMP (<b>document 7.8 (B)</b>) sets out the measures proposed in relation to veteran trees. This is based on retaining a buffer width of 5m from the edge of the canopy of the veteran tree, or up to fifteen times the tree stem diameter, whichever is the greater, where practicable and identifying further measures, which could include hand digging where this is not practicable.</p> <p>The Applicant notes that based on the Proposed Alignment a buffer can be provided around all veteran trees within the Order Limits, except T378 noted above.</p>

# 3. Written Representations regarding Dedham Vale CSE Compound

## 3.1 Location of the Dedham Vale East CSE Compound

- 3.1.1 Nineteen WRs [REP2-033], [REP2-034], [REP2-035], [REP2-037], [REP2-038], [REP2-046], [REP2-047], [REP2-048], [REP2-049], [REP2-050], [REP2-051], [REP2-052], [REP2-053], [REP2-058], [REP2-059], [REP2-062], [REP2-063], [REP2-064] and [REP2-065], expressed their objection to the proposed location for the Dedham Vale East CSE compound and instead favoured a location approximately 800m north-east of the proposed CSE compound location, at Layham Quarry. These WRs are identical in their drafting and cite material considerations for the suggested Layham Quarry alternative location on the basis of air quality and emissions; biodiversity, ecology and nature conservation; land rights; construction issues; good design; Horlock and Holford Rules; the historic environment; impact to human health; landscape and visual impacts; land use and soil; noise and vibration; the water environment and traffic and transport impacts.
- 3.1.2 It is also worth noting that WR [REP2-016], from Layham Parish Council, endorses the nineteen WRs referenced above.
- 3.1.3 The Applicant’s response in Table 3.1 below therefore addresses the matters raised in the nineteen WRs noted in Paragraph 3.1.1 on a consolidated basis.

Table 3.1 – Location of the Dedham Vale East CSE Compound

Reference	Matter	Points Raised	Applicant’s Comments
N/A	Location of the Dedham Vale East CSE compound	<p>This written representation is to disagree with the location of the proposed Dedham Vale East CSE Compound on Millwood Road and to propose an alternative site.</p> <p>In order to show why there is a much better location the list of ‘Initial Assessment of Principle Issues’ has been used to compare both sites. The plan shows both sites with key features identified.</p> <p>The alternative proposed site in the nearby disused gravel pit has significant advantages</p>	<p>The Applicant has undertaken an options appraisal of the CSE compounds, which considered alternative locations and took into account the local landform and existing screening when determining the preferred locations. The environmental effects associated with each of the different CSE compound locations explored are presented in Table 3.13 of ES Chapter 3: Alternatives Considered [APP-071].</p> <p>A key principle in the siting of the Dedham Vale East CSE compound was that the CSE compound should be located outside of Dedham Vale AONB to avoid conflict with national policy.</p> <p>A change was made to the Dedham Vale East CSE compound location following feedback from the non-statutory consultation and shown as part of the Statutory Consultation in March 2022. The change provided more undergrounding and</p>

Reference Matter	Points Raised	Applicant's Comments
	<p>over the Millwood Road site in every category of the 'Initial Assessment of Principle Issues'. The land in between the two sites is level and in a straight line so in terms of trench construction, this is a straight forward minor addition in length to the underground trenching with no technically difficult engineering problems.</p>	<p>increased the distance of the CSE compound from the AONB boundary to avoid effects on the AONB.</p> <p>The proposed Dedham Vale East CSE compound at Millfield Wood (Option 2a) is located approximately 1km from the AONB boundary. The option selected is also located away from Polstead Conservation Area and Dollops Wood, therefore, avoiding effects on the woodland habitats and species. The proposed CSE compound is also located between two woodland blocks (Millfield Wood south and north of the CSE compound) and, therefore, benefits from the screening provided by the trees to reduce landscape and visual effects on surrounding receptors.</p> <p>Planting has been embedded into the design of the project at each CSE compound to help filter views and soften the effects from surrounding receptors. See EM-D01 in the REAC (<b>document 7.5.2 (B)</b>) and as shown on LEMP Appendix B: Vegetation Reinstatement Plan (<b>document 7.8.2 (B)</b>) which shows the location of the proposed embedded planting at the CSE compound.</p> <p>The detailed design and procurement stage of the project, which would happen post-consent, will further refine the design and layout of the CSE compounds within the Limits of Deviation (LoD), taking into account detailed ground levels and the final positioning of the embedded planting and fencing.</p> <p>A CSE compound located at Layham Quarry was specifically considered in response to consultation feedback as one of the alternative locations for the Dedham Vale East CSE compound (Option 2c) in Table 3.13 of ES Chapter 3: Alternatives Considered [<b>APP-071</b>].</p> <p>The Layham Quarry location is approximately 800m north-east of the proposed CSE compound location and approximately 2.1km north-east of the location of the Dedham Vale East CSE compound shown at the non-statutory consultation in March 2021.</p> <p>In addition, the working area for an underground cable route to Layham Quarry would be constrained by the two blocks of woodland at Millfield Wood and the existing operational overhead line. There are also potential risks associated with historic landfill at Layham Quarry; the longer length of underground cable would have greater risk of encountering archaeology and they may be potential effects on Layham Pit Woodland CWS and Meadow and Valley Farm Wood CWS and disturbance to protected species.</p>

Reference Matter	Points Raised	Applicant's Comments
		<p>Whilst a move to Layham Quarry would locate the CSE compound further away from the AONB boundary, the additional cost associated with the extra underground cabling (approximately 800m) would not be justified in terms of policy or the Applicant's statutory duties to be economic and efficient. Due to commercial confidentiality and ongoing procurement processes the Applicant is unable to provide absolute costs for this alternative proposal. However, in general terms the cost of underground cables is between four and ten times the cost of an overhead line equivalent. The proposed re-location of the Dedham Vale East CSE compound to Layham Quarry and resulting additional length of underground cables would add at least £16m to the overall project cost.</p> <p>The Applicant holds the Transmission Licence for England and Wales and is, therefore, regulated by Ofgem, the electricity and gas markets regulator, to ensure value for money for consumers and is required under the Electricity Act to <i>'develop and maintain an efficient, coordinated and economical electricity transmission system, and to facilitate competition in supply and generation of electricity.'</i> These duties and obligations mean that the Applicant has a responsibility to deliver new electricity transmission infrastructure but also to be responsible for the cost of projects as costs will ultimately be borne by electricity users.</p> <p>Overall, avoiding the moderate adverse effects of an overhead line on a landscape which carries no national designation, and on local views, could only be achieved at a significant additional cost in these areas. National Policy Statement EN-5 considers that the Examining Authority should only refuse consent for overhead line proposals in favour of an underground option if it is satisfied that the benefits from the non-overhead line alternative would clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable with consideration to the landscape in which the proposed line would be set, the additional cost of undergrounding and the environmental and archaeological consequences of undergrounding.</p> <p>Additionally, having specific regard to the policy tests of paragraph 2.8.9 of EN-5 and in paragraph 2.9.25 of draft replacement EN-5, the <i>'potentially very disruptive effects of undergrounding'</i> are not justified as the harm to the landscape, visual amenity and natural beauty would not outweigh the environmental effects associated with undergrounding. The Applicant is confident that the project strikes the appropriate balance of overhead line and underground cables.</p> <p>It is also important to note that discussions have taken place with Suffolk County Council (SCC) and the Quarry owners (Brett Aggregates) regarding Layham Quarry, to obtain an understanding of the history of mineral extraction at the site along with</p>

Reference Matter	Points Raised	Applicant's Comments
		<p>any future plans. At present, the site is inactive (since 2013); however, planning permission was granted in 2019 to extend the existing permission.</p> <p>A planning application to extend the timescales for extraction and restoration at Layham Quarry to April 2032 and October 2033, respectively, was approved in October 2019 (planning reference: SCC/001]8/19B/VOC). The Planning Statement [APP-160] details this in Appendix C; see Assessment Reference: D/2 of Appendix C.</p> <p>National Policy Statement (NPS) EN-1, states at paragraph 5.11.19 that, 'applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place'. Paragraph 5.11.28 goes on to state, 'where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.'</p> <p>Layham Quarry remains an allocation site, benefiting from Policy MS5 (Layham) of the Suffolk Minerals and Waste Local Plan (adopted in July 2020). Layham Quarry is allocated for mineral extraction in the adopted version of the Suffolk Minerals Local Plan, having an estimated mineral resource of 829,000 tonnes. The policy states that the Council will grant planning permission at this site for future sand and gravel extraction.</p> <p>Meanwhile, Policy MP10 (Minerals consultation and safeguarding areas) of the same plan advises that 'Suffolk County Council will safeguard 'areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction... any proposed development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working.'</p> <p>It is noted in the Planning Statement [APP-160] that the new overhead line in this location would not result in the sterilisation of minerals, as minerals could be extracted from beneath the overhead line, as evidenced at Layham Quarry, which is crossed by both the existing 400kV overhead line and the existing 132kV overhead line. However, a CSE compound development at this location may prejudice the future extraction of minerals at this allocated site, which may be considered contrary to local and national planning policy.]</p>

---

Reference Matter	Points Raised	Applicant's Comments
		The Applicant has therefore concluded that when taking into account all of its duties (which includes the need to be economic and efficient) and the National Policy Statements, on balance the proposed location is considered to be suitable, and that the Dedham Vale East CSE compound should be sited at the location as proposed.

---

## 4. Written Representations from Individuals

### 4.1 Alan Hall [REP2-041/042/043]

Table 4.1 – Alan Hall [REP2-041/042/043]

Reference	Matter	Points Raised	Applicant's Comments
0001	Design of temporary access bellmouth	Proposed access route will materially impact mature trees and property boundary	<p>The Applicant understands that the proposed access is the temporary access point AB-AP5. The Applicant has included a bellmouth at this location as it is an existing site entrance (with an existing gap in the hedgerow) that is used by the landowner to access the agricultural fields. The Applicant in general sought to use existing and upgraded accesses where practicable to avoid construction of entirely new accesses on to the public highway and the associated environmental impacts of doing this, for example: removal of vegetation, culverting ditches, impact on agricultural land, highway safety etc.</p> <p>The Applicant understands that the trees that the Affected Person references, are the mature trees to the south of the proposed access point. Sheet 2 of LEMP Appendix A: Vegetation Retention and Removal Plans [APP-183] shows the vegetation immediately adjacent to the access point (up to 10m either side) may need to be removed to allow access by the construction vehicles. The vegetation for up to 40m either side of the access point is also shown on the same plan as potentially being cut back or coppiced to provide sight lines for vehicles exiting onto the local road networks at this access point. 40m is considered to be a worst case for assessment purposes. The risk assessment that would determine the length of sight lines at a specific location (based on factors such as road speed and vehicle types and numbers) would confirm what vegetation would need to be removed or managed.</p> <p>The Applicant has engaged with the Affected Person at length over the matter and has explored reasonable options to avoid the potential need to remove trees on the Affected Person's land boundary. The Applicant has also made it clear to the Affected Person that the project has not yet reached a detailed design stage, which typically occurs post DCO consent. The Local Highway Authority will not agree to any concession on the requirement of a full visibility splay until a detailed design is produced. There is however agreement in principle between the Applicant's highways consultant and the Local Authority for the detailed design of accesses to reduce</p>

Reference	Matter	Points Raised	Applicant's Comments
			<p>impact using site-specific design speed, site-specific vehicle numbers and sizes, as well as a site-specific review of how to minimise tree and hedge removal.</p> <p>The Local Highway Authority has confirmed that they would prefer to see raised tree crowns (management) as opposed to complete tree removal. As such, although the Order Limits must be retained as shown, the Applicant considers there to be an opportunity for the impact of the proposal to be reduced considerably at detail design stage.</p>
0002	Failure to engage effectively	Engagement delayed reasonable resolution of issues raised	<p>The Applicant has reviewed a timeline of communication with this Affected Person and is satisfied that an appropriate level of engagement was undertaken. Initial contact with the Affected Person occurred in June 2021 as part of the land referencing exercise.</p> <p>In accordance with Section 42 of the Planning Act 2008, the Affected Person was formally consulted as part of the Applicant's pre-application consultations.</p> <p>The Affected Person was also contacted in September 2022 following updates made to the project design between January 2022 and September 2022. The Affected Person was suitably notified of the fact their property was within the Order Limit and an opportunity to provide feedback was offered.</p> <p>The Applicant and its agents have retained two-way communication from September 2022 to date and remain in discussion.</p>
0003	Inadequate consultation and subsequent engagement	Consultation and engagement did not result in satisfactory outcome	The Applicant refers to the response provided above in respect of Reference 0002.

## 4.2 Belinda Nott [REP2-054]

Table 4.2 – Belinda Nott [REP2-054]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Consultation process	The Applicant has not listened, adjusted their proposals, compromised, or accommodated	The Applicant has sought to engage with the Affected Person and their agents and has had many meetings, consultation events and discussions in person, by email and



Reference Matter	Points Raised	Applicant's Comments	
	<p>any of our suggestions. I question whether the correct procedures were followed during consultation and what is the purpose of the consultation if questions are unanswered, and proposals have since evolved?</p>	<p>telephone to detail the project, the Applicant's proposals and listen to the Affected Person's concerns.</p> <p>The Applicant has given careful consideration to the alternative routes proposed and concerns raised by the Affected Person however it is the Applicant's position that the proposed route for the temporary access route off the A131 is the most appropriate proposal having regard to all the, often competing, considerations the Applicant is required to take account of.</p> <p>The Applicant also refutes the suggestion that the proposed development has not been amended following consultation. The temporary access route off the A131 was itself partly driven by consultation feedback received at statutory consultation. The route of the access route itself was also subsequently amended following landowner feedback at the targeted consultation. The Applicant of course is unable to make all changes proposed in consultation feedback but where it hasn't been possible the reasons for this are set out in the Consultation Report [APP-043].</p>	
N/A	Permanent rights	<p>Can the Applicant now propose a permanent right of access over my father's land for the haul road when this was not proposed during the consultation period?</p>	<p>The Applicant has responded to this point at Table 2.13: Options and Routing-Temporary Access Route in the Applicant's Comments on Relevant Representations [REP1-025].</p>
N/A	Use of existing road network	<p>Essex Highways should survey part or all the road network for suitability. The use of the roads would alleviate extra haul road construction traffic, destruction of arable land and habitat in conjunction with all the other benefits.</p>	<p>The Applicant's assessment of traffic generation effectively ruled out the use of the local highway network. A summary is presented in the Technical Note on Temporary Access Route off the A131 (<b>document 8.5.5</b>).</p>
N/A	Analysis of alternatives not done	<p>Can the Applicant provide proof that they have looked at all options of alternative haul road routes and their reasoning why the current proposal is the best one?</p>	<p>The outcome of the Applicant's assessment of the alternatives was that neither a highway only or a hybrid (part highway, part temporary access route) would allow the proposed development to be delivered in an appropriate manner. A summary is presented in the Technical Note on Temporary Access Route off the A131 (<b>document 8.5.5</b>).</p>
N/A	Survey not done before route decision:	<p>The Applicant was unable to answer your questions regarding surveys of the haul road as they had not been completed on my father's land. At this date there has only been one soil survey which is currently incomplete. How can</p>	<p>The Applicant notes that the application was accepted for examination (pursuant to S.55 of the Planning Act 2008) and also refers to its "Legal Note on EIA Points Raised at Preliminary Meeting" submitted to the Examination [REP1-035], which addresses the approach to environmental information. The Applicant is of the view that the requirements in respect of EIA have been met.</p>

Reference Matter	Points Raised	Applicant's Comments
	<p>any decisions be made without having all the research information or even detailed plans of the route? It appears that the proposal has not been fully assessed.</p>	<p>As noted in Table 3.1 in the Applicant's Response to Rule 9 Letter Dated 24 July 2023 [AS-005], the baseline habitat information presented within the ES [APP-075] was based on desk study information, including project data searches from the Local Records Centre. High resolution aerial imagery was used to support the baseline assessment. This showed that the temporary access route crosses arable fields with hedgerows as described in ES Appendix 7.1: Habitats Baseline Report [APP-109] and shown on Habitats of Protected Species and Important Habitats [APP-014].</p> <p>The ecological verification surveys undertaken in August 2023 and the survey results can be found in the Ecological Survey of the Temporary Access Route off the A131 [REP1-036] submitted at Deadline 1. As stated in paragraph 3.1.2 of the Ecological Survey of the Temporary Access Route off the A131, the surveys confirm that the temporary access route off the A131 passes through arable fields, which are low ecological value habitats. This confirms the assumptions made in the ES at Appendix 7.1: Habitats Baseline Report [APP-109].</p> <p>An arboricultural survey of the temporary access route off the A131 was also undertaken in August 2023. The results are presented in the updated Arboricultural Impact Assessment [REP1-012] published at Deadline 1. This confirms that no veteran trees are likely to be affected as a result of the proposed temporary access route off the A131.</p> <p>The LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] shows the vegetation likely to be affected from the temporary access routes and visibility splays along the A131 on Sheet 30.</p>
N/A	<p>Head of Terms, Deed of Grant and Deed of Easement are unclear.</p>	<p>The draft HoT, Deed of Grant and Deed of Easement are unclear or not updated to the specifics of the haul road.</p>
N/A	<p>Propose alternative route to be left as a permanent feature</p>	<p>Please consider an alternative route around the boundary which would less affect farming operations and field drainage. If detailed terms could be agreed, this could be left in situ and landscaped with less disruption if needed again in the future.</p>

Reference	Matter	Points Raised	Applicant's Comments
N/A	Request another ExA site inspection	I would urge that a more site-specific inspection is completed when a clearer view can be seen now that the verges have been cut	The Applicant has no comment to make on this matter.

### 4.3 C E Gardiner and Sons [REP2-039/040]

Table 4.3 – C E Gardiner and Sons [REP2-039/040]

Reference	Matter	Points Raised	Applicant's Comments
<b>C.E. Gardiner [REP2-039]</b>			
N/A	Surveys of the temporary access route	<p>Despite requesting copies, we still haven't seen any surveys proving the need for a haul road, let alone any ecological surveys on the land itself.</p> <p>We still haven't seen any surveys proving the need for a haul road let alone any ecological surveys on the land itself... "surveys are ongoing at present and we would receive them very soon". Nearly a year on and still no surveys?</p>	<p>The Applicant's response is detailed in Technical Note on Temporary Access Route off the A131 (<b>document 8.5.5</b>).</p> <p>The Applicant wrote to the Affected Person on 23 November 2022 to request access for survey work. In the event comprehensive desktop information together with information provided by the Affected Person was used as access was not granted until 31 March 2023.</p> <p>The Applicant notes that the application was accepted for examination (pursuant to S.55 of the Planning Act 2008) and the Applicant also refers to its Legal Note on EIA Points Raised at Preliminary Meeting [<b>REP1-035</b>], which addresses the approach to environmental information. The Applicant is of the view that the requirements in respect of EIA have been met.</p> <p>As noted in Table 3.1 in the Applicant's Response to Rule 9 Letter Dated 24 July 2023 [<b>AS-005</b>], the baseline habitat information presented within the ES [<b>APP-075</b>] was based on desk study information, including project data searches from the Local Records Centre. High resolution aerial imagery was used to support the baseline assessment. This showed that the temporary access route crosses arable fields with hedgerows as described in ES Appendix 7.1: Habitats Baseline Report [<b>APP-109</b>] and shown on Habitats of Protected Species and Important Habitats [<b>APP-014</b>].</p> <p>The ecological verification surveys undertaken in August 2023 and the survey results can be found in the Ecological Survey of the Temporary Access Route off the A131 [<b>REP1-036</b>] submitted at Deadline 1. As stated in paragraph 3.1.2 of the</p>

Reference Matter	Points Raised	Applicant's Comments
		<p>Ecological Survey of the Temporary Access Route off the A131, the surveys confirm that the temporary access route off the A131 passes through arable fields, which are low ecological value habitats. This confirms the assumptions made in the ES at Appendix 7.1: Habitats Baseline Report [APP-109].</p> <p>An arboricultural survey of the temporary access route off the A131 was also undertaken in August 2023. The results are presented in the updated Arboricultural Impact Assessment [REP1-012] published at Deadline 1. This confirms that no veteran trees are likely to be affected as a result of the proposed temporary access route off the A131.</p> <p>The LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] submitted with the application for development consent included the vegetation likely to be affected from the temporary access routes and visibility splays along the A131 on Sheet 30.</p>
N/A	We have been totally ignored and National Grid has only met with us to tick a box. No proper analysis of the route or alternatives have been carried out. They have not been transparent with their requirements and not taken any of our concerns on board	<p>The Applicant has sought to engage with the Affected Person and their Agents and has had many meetings and discussions in person by email and telephone to detail the project, the Applicant's proposals and listen to the Affected Person's concerns.</p> <p>The Applicant of course is unable to make all changes proposed in consultation feedback but where it hasn't been possible the reasons for this are set out in the Consultation Report [APP-043].</p>
N/A	Why can National Grid create new rights (Class 4 Article 24) this late in the application process which will have huge impact on the long term value of the farm?	<p>The Applicant has been seeking voluntary HoTs with Affected Persons for many months. The Applicant is only able to apply for compulsory acquisition or temporary possession powers (including class 4) at the point at which the application for development consent is submitted and so does not consider that this is 'late in the process'.</p> <p>In addition, the Applicant notes that in its statutory consultation materials (Project Background Document, January 2022) it was stated that the Applicant would be seeking the compulsory acquisition of land or rights as part of its application for development consent.</p>
N/A	No proper analysis of the route or alternatives have been carried out. They have not taken any of our concerns on board and seem to be able to "change the goal posts" whenever it suits them.	The Applicant's response is detailed in the Technical Note on Temporary Access Route off the A131 ( <b>document 8.5.5</b> ).

Reference Matter	Points Raised	Applicant's Comments
N/A	Need for permanent rights	The Applicant has responded to this point at Table 2.13: Options and Routing-Temporary Access Route in the Applicant's Comments on Relevant Representations [REP1-025].
<b>C.E. Gardiner [REP2-040]</b>		
N/A	Temporary Access Route How can a planning application be submitted without all the required surveys?	<p>The Applicant wrote to the Affected Person on 23 November 2022 to request access for survey work. In the event comprehensive desktop information together with information provided by the Affected Person was used as access was not granted until 31 March 2023.</p> <p>The Applicant notes that the application was accepted for examination (pursuant to S.55 of the Planning Act 2008) and also refers to its Legal Note on EIA Points Raised at Preliminary Meeting [REP1-035], which addresses the approach to environmental information. The Applicant is of the view that the requirements in respect of EIA have been met.</p>
N/A	Over the last year we have given National Grid alternative routes including leaving a permanent haul road around some of the perimeter of the fields to minimise the disruption to the landowner wildlife and contractors. We have been totally ignored and NG have only met with us to tick a box.	<p>The Applicant has sought to engage with the Affected Person and their Agents and has had many meetings and discussions in person by email and telephone to detail the project, the Applicant's proposals and listen to the Affected Person's concerns.</p> <p>The Applicant considered this alternative proposal along with the other alternative routes suggested by the Affected Person. Where possible, taking account of other constraints and considerations, the temporary access route does follow field boundaries.</p>
N/A	In January this year NG have changed the haul road from temporary to permanent i.e. they have a right to reinstate and subject the land to more destruction whenever they please.	The Applicant has responded to this point at Table 2.13: Options and Routing-Temporary Access Route in the Applicant's Comments on Relevant Representations [REP1-025].
N/A	Why can National Grid create new rights (class 4 article 24) this late in the application which will have huge impact on the long term value of the farm?	<p>The Applicant has been seeking voluntary HoTs with Affected Persons for many months. The applicant is only able to apply for compulsory acquisition or temporary possession powers (including class 4) at the point at which the application for development consent is submitted and so does not consider that this is 'late in the process'.</p> <p>In addition, the Applicant notes that in its statutory consultation materials (Project Background Document, January 2022) it was stated that the Applicant would be</p>

Reference Matter	Points Raised	Applicant's Comments
		seeking the compulsory acquisition of land or rights as part of its application for development consent.
N/A	Analysis of alternatives	The Applicant has given careful consideration to the alternative routes proposed and concerns raised by the Affected Person however it is the Applicant's position that the proposed route for the temporary access route off the A131 is the most appropriate proposal having regard to all the, often competing, considerations the Applicant is required to take account of.

## 4.4 Francis Prosser [REP2-060/061]

Table 4.4 – Francis Prosser [REP2-060/061]

Reference Matter	Points Raised	Applicant's Comments
<b>1 Commentary on Examination Process/ Assessment of Application Documents</b>		
1	<p>Commentary on examination process/ assessment of application documents</p> <p>Publication of information is not the same as transparency or engagement – the sheer volume and formality of documents make it hard for an individual to assess – especially when the preceding consultations have been a similar ordeal.</p> <p>As an individual it is also hard to follow the prescribed route for making submissions, which even detail how the submission should be titled and indexed, and how and what we can comment on by when.</p>	The Applicant notes the comments raised by the Affected Person about the examination process and the breadth of material available as part of the application. Given that this process was established by Government and managed by the Planning Inspectorate, the Applicant does not consider it appropriate to comment on this topic further.
<b>2 Consultation Process/Application Information</b>		
2a	<p>Limits of deviation</p> <p>Is it sufficient that the plans (maps/ charts) as submitted are in general 'indicative' and allow deviation' within any eventual DCO? Surely at this stage they should be firm, especially</p>	The Applicant's submitted plans include Limits of Deviation (LoD). LoD are a common feature of linear infrastructure projects as they provide the necessary flexibility when constructing the authorised development, reducing the risk that the project as approved cannot later be implemented for unforeseen engineering or

Reference	Matter	Points Raised	Applicant's Comments
		<p>where they relate to such important matters as an actual 50m pylon?</p> <p>What assurances do we have that the plans as submitted will be the ones built, or that there will indeed be a further consideration of 'micro' issues?</p>	<p>environmental reasons. For example, previously unidentified poor ground conditions may require a pylon to be moved for geotechnical reasons, such as ground stability.</p> <p>The LoD set specific parameters for moving infrastructure on the ground, as well as controlling changes to the vertical height of infrastructure. As such, although final pylon placement cannot be confirmed with the application for development consent, there are controls in place to prevent significant deviation from the submitted plans.</p>
2b	Pylons around Hintlesham Woods	<p>The plans for pylons around Hintlesham Woods constantly referred to the seven new pylons as "realigned", both in writing in the consultation publicity and on the maps. Again, this has been pointed out to National Grid on many occasions as being a misrepresentation to anyone assessing the plans in summary or even studying the maps in detail.</p> <p>Can National Grid point to anything in the over-a-decade-long consultation has resulted in serious amendment to their original intentions and plans on our stretch? As far as I can see on our section (originally AB Bramford-Hintlesham) there has been no material mitigation or change, let alone taking into account our own personal representations. Perhaps the addition of some 'environmental' areas for so-called 'offset'.</p>	<p>At both non statutory and statutory consultations, the material referred to Option 1 in the same way 'build a new section of overhead line to the north of Ramsey Wood and divert the existing 400kV line onto these pylons. The new 400kV overhead line would reuse the existing pylons through the woods.' This accurately reflects the proposals for Option 1, i.e., the new section of overhead line is proposed around the north of Ramsey Wood (albeit this would operate as part of the existing line), while the existing line between Ramsey Wood and Hintlesham Wood would be retained (albeit this would be re-conducted and operate as part of the new line). This was made clear on the General Arrangement Plans provided as part of the statutory consultation material.</p> <p>The Applicant's proposals have evolved significantly since work on the project first took place in 2009. At the time of the first consultation in autumn 2009, the Applicant sought views on four broad corridors within which its proposals could be located. This included consideration of corridors to both the north and south of the corridor that ultimately forms part of the application for development consent.</p> <p>More recently, the Applicant sought views on whether an alternative routeing (Hintlesham Woods Option 2) should be taken in Section AB, albeit this option was eventually discounted and removed from the proposals. This decision was made based on consultation feedback and engagement with stakeholders and landowners, the finding of environmental surveys and the presence of rare and protected species in the woodland, policy designations, landscape and visual impact, and further design and engineering studies. When weighing up and balancing these considerations against national planning policy and the Applicant's licence obligations, it concluded that the routeing included within the application for development consent (Hintlesham Woods Option 1) should be taken forward.</p>
<b>3 Specific Points Relating to 'Additional' Consultation and Amended Plans October-December 2022</b>			
3	Consultation on the project	...the consultation process has been flawed (now across three decades).	The Applicant reiterates that it has held a total of three consultation periods on its proposals since work resumed on the project in 2020, following extensive consultation between 2009 and 2013 prior to the project being paused. The

Reference	Matter	Points Raised	Applicant's Comments
			<p>Consultation Report [APP-043] describes the extensive process undertaken and the regard had to feedback received. In addition, there have been ongoing discussions with landowners and other stakeholders both during and outside of these consultation periods, including throughout the examination period.</p> <p>As such, the Applicant considers that the consultation activity undertaken has been thorough and appropriate. As set out in Table 2.2 of the Applicant's Comments on Relevant Representations [REP1-025], it should be noted that all host authorities provided an adequacy of consultation response to the Planning Inspectorate and gave positive feedback (excluding one comment about a meeting arranged by the local authority that the Applicant chose not to attend as it was offering its own consultation events).</p>
3.1	Changes to plans/ Order Limits/ access points/ mitigations	<p>After 12 years of planning, including the full statutory consultation in Spring 2022, National Grid made some changes to their plans shortly before making the application - these were not discussed or 'consulted on' in the same ways as before, and some might say cynically obscured in the publications and the way in which a 'secondary consultation' was included.</p> <p>National Grid has then treated this process [targeted consultation] in retrospect as 'consultation', but it wasn't.</p> <p>I wrote to National Grid as part of my submission questioning the scope and publicity for it, and also pointed this out separately (email of 18/10). I received no reply. In March 2023 I wrote by email to complain to National Grid about the specifics so they could amend their application and requesting a meeting to discuss. I received no reply.</p>	<p>Table 2.3 of the Applicant's Comments on Relevant Representations [REP1-025] sets out the Applicant's comments on the scope and rationale of the targeted consultation held in autumn 2022.</p> <p>Given the nature of the changes to the Applicant's proposals at the time of this consultation, it chose to target some engagement activity towards those areas which were more likely to be impacted by those changes. As such, the Applicant wrote specifically to all properties within Sections G and H of the route.</p> <p>However, the Applicant also advertised the consultation in a number of ways to communities along the full route of the project. This promotional activity included writing to all prescribed consultees and local representatives such as parish councils, making information available at deposit points along the route of the project and advertising in social media and in print. Where relevant and proportionate, the Applicant also sought to undertake the consultation in accordance with the Statement of Community Consultation.</p> <p>During the pre-application public consultations, it was not the Applicant's approach to provide individual responses to consultation feedback. This feedback, along with the Applicant's response to comments, is fully accounted for in the Consultation Report [APP-043]. However, the Applicant has still had direct contact with the author of the representation outside of the consultation periods, such as through meetings and emails referenced elsewhere in their representation.</p>
3.2	Hintlesham Woods	The preferred Option 2 route around Hintlesham Woods - paralleling existing lines rather than adding new ones across 3-4km of open unspoilt countryside and habitat - was	Following the Applicant's decision to remove Hintlesham Woods Option 2 from its plans, it wrote to stakeholders in December 2022 to explain this decision. The Applicant provided additional information regarding this decision to the author of the relevant representation in response to a follow-up email on the decision.



Reference Matter	Points Raised	Applicant's Comments
	<p>put forward as a result of the original consultations and strong local support. However, the later rationale for rejecting this option, in a published statement/email in December 2022, was never made clear beyond a very general summary of various points and there was never an opportunity to discuss it. Although National Grid claims that further discussions were held with "consultees" – and some kind of weight of opinion was behind it - these remain obscure and unpublished and, in any case, would not have been by a proper market survey. They cannot have been complete because they did not include me or anyone I know along the additional new route around Ramsey Wood.</p> <p>At best there seem to be some tenuous and selective environmental arguments which did not take into account the wishes of affected residents and landowners - as far as I am aware, despite National Grid claiming it did – it was simply high-level statements that the Option had been discounted, and which are now simply being repeated."</p> <p>The eventual application was also counter to our understanding that at least both Options would be put as part of the application to the Planning Inspectorate.</p> <p>I would suggest that most if not all of the directly affected people on our section would prefer some combination of undergrounding and a parallel route (Option 2).</p> <p>The rationale for this conclusion is not adequately provided and I do not believe is sufficient to simply justify this by saying it was "due to several important considerations including but not limited to: consultation</p>	<p>Section 5.7 of The Planning Statement [<b>APP-160</b>] sets out in further detail the Applicant's approach to options identification and selection, with paragraphs 5.7.38 to 5.7.55 providing specific commentary around the approach to routeing in Section AB: Bramford Substation/Hintlesham. Additionally, Table 3.5 of ES Chapter 3: Alternatives Considered [<b>APP-071</b>] provides a summary of the key environmental factors considered during the option selection process for the possible alignments considered in Section AB, including underground cable alignments.</p> <p>The Applicant has engaged with a wide range of stakeholders through the pre-application stage and into the examination phase. The RSPB is an example of one such organisation where the Applicant has extensive pre-application engagement, as would be expected on a project of this type. Section 2.2. of the Draft Statement of Common Ground with the Royal Society for the Protection of Birds (RSPB) [<b>REP1-028</b>] provides a summary of this engagement.</p> <p>It is correct that the Applicant had previously indicated it was considering whether to include both routeing options at Hintlesham Woods within its application for development consent. However, the Applicant subsequently decided to pursue a single option prior to submitting an application, in order to provide certainty to those who live in the area and may be affected. Had the Applicant not communicated the decision on the routeing in December 2022 and included both options within its application for development consent, then there was the potential for a further two years of uncertainty before a decision on which option to proceed with was made as part of the Development Consent Order process.</p>

Reference	Matter	Points Raised	Applicant's Comments
		<p>feedback and engagement with stakeholders and landowners (who was that? what was it?); the findings of environmental surveys.... etc".</p> <p>There was no further adequate and open consultation on this.</p>	
<b>4 Undergrounding</b>			
3.2 and 4	Underground the line around Hintlesham Woods	<p>There has been no proper consideration of undergrounding in areas where there will be a concentration of pylons. I and many others do not believe that National Grid has conducted the right studies and assessment for this – the technology exists and the firm can afford it.</p> <p>If this is a national project that is so important that it warrants undergrounding for much of the rest of the route then it should be undergrounded here, around Hintlesham Woods.</p> <p>Ultimately this reinforcement should be made subsea around the coast of East Anglia and there is plenty of separate support, commentary on and rationale for that.</p> <p>That group response [to a previous consultation] also asserted that the eventually 'preferred' Option2B (now Option1) is in breach of the Holford Rules, something we have not heard too much about in this later consultation and is presumably something the Planning Inspectorate will now be considering in detail).</p>	<p>The Applicant has carefully considered which transmission technology type to utilise as part of the development of its proposals.</p> <p>Under the Electricity Act 1989, the Applicant has a duty to develop projects that are efficient and economical. Furthermore, National Policy Statement EN-5 acknowledges that overhead lines are appropriate in many instances, but that there may be specific locations where underground cables are appropriate depending on the sensitivity of the baseline environment. This is set out in further detail in paragraphs 5.7.22 to 5.7.4 of the Planning Statement [APP-160]. Sections 5.8 and 5.9 of this report also set out how the Holford Rules have influenced the design of the proposals, with paragraphs 5.7.38 to 5.7.55 including specific reference to how the Holford Rules were considered as part of the approach to routeing around Hintlesham Woods.</p> <p>As such, the Applicant has carefully considered underground cable routes within each section of its proposals. A summary of the alignments considered in each section and the key environmental factors considered within the appraisal is presented within Table 3.6 of ES Chapter 3: Alternatives Considered [APP-071]. As part of this, it is worth noting that the undergrounding of existing infrastructure does not form part of the scope of the project.</p>
<b>5 Construction Process</b>			
5	Consultation process and	The damaging impact of the construction process has been glossed over and I am pretty sure many residents including us are unaware	Information on construction activity and associated impacts has formed part of the Applicant's pre-application public consultation.

Reference	Matter	Points Raised	Applicant's Comments
	impact on residents	<p>of the likely and potential effects, even after 14 years of consultation.</p> <p>We can see that the process will have a massive physical, financial and mental impact on a great many people, who will in effect be trapped in their homes, unable to avoid the disruption, as well as on the landscape, road and pollution, with severe disruption to wildlife, possibly irreversible in the case of Hintlesham Woods.</p> <p>National Grid has been very light on the information provided about the intended construction process - methods / timing / access / environmental damage – and even now seems to be making up plans.</p> <p>I have requested that National Grid discuss detailed plans with directly affected landowners and residents including myself, who would have a further opportunity for their views to be considered before construction activity, since this was not part of the original consultation process.</p>	<p>At the statutory consultation stage, this included providing a non-technical summary of the Preliminary Environmental Information Report (PEIR), which included consideration of the potential environmental impacts of the project during the construction phase, along with outline detail on how these impacts could be mitigated and managed. Additionally, the Applicant held an online webinar specifically on the potential construction and environmental impacts of the project. It also prepared a specific exhibition panel on the topic of construction for the public information exhibitions held during the consultation period. This information has been supplemented in the Applicant's application for development consent with the inclusion of a detailed Environmental Statement (ES) (<b>Volume 6 of the application</b>).</p> <p>As part of the Environmental Impact Assessment Scoping Report [APP-156], specific consideration was given to the effects of the project on the health and wellbeing of people. The Scoping Report concluded that the project was unlikely to result in significant effects on health and wellbeing, when taking into account the embedded and good practice measures. As such, a full ES Chapter on health and wellbeing was not produced. However, health and wellbeing information informed the baseline environment for the intra-project and inter-project cumulative effects assessment, including cross references to other ES chapters as appropriate. This is detailed in ES Appendix 15.1 Cumulative Effects Baseline [APP-140].</p> <p>X116 within Table 7.7 of the Consultation Report [APP-043] and Table 2.28 within the Applicant's Comments on Relevant Representations [REP1-025] provide further detail on how mental and physical health impacts have been considered through the development of the proposals.</p> <p>Although the application for development consent has been submitted, the Applicant remains open to meeting with landowners and residents to discuss its plans, as suggested by the author of the representation.</p>
5	Rights of way and access points	<p>Footpaths: what restrictions will be in place? If so, for how long? There is no detail nor specific application as far as I can see.</p> <p>Access and construction road: is National Grid able to adequately explain the need for so many access points when the intention is to construct a major haul road along the length of the pylon route? Surely this is an unnecessary duplication of destruction and disturbance.</p>	<p>No permanent diversions or closures of Pedestrian Rights of Way (PRoW) would be required as part of the project. However, Appendix F of the Transport Assessment [APP-061] sets out details of the PRoW diversions that would be required, including the location, work activity, management duration, type of closure and diversion route (if applicable). Paragraph 2.24 of this same report also provides detail on the temporary access points identified by the Applicant as part of the proposals. Of the 126 temporary access points required, it is worth noting that 74 of these would make use of existing access points on the local road network. The Applicant submitted at Deadline 3 a PRoW Management Plan (<b>document 8.5.8</b>) that sets out the temporary</p>

Reference	Matter	Points Raised	Applicant's Comments
			measures which would be implemented in relation to routes with public access which are affected by the construction of the project.
5	Effects during construction	What mitigation would be put in place for the various impacts outline above including pollution, emissions, traffic, security etc.	ES Chapter 16 Environmental Management and Mitigation [APP-084] provides an overview of the documents within the application for development consent that detail the Applicant's proposed environmental mitigation and good practice measures, such as those points referenced in the author's representation. With regard to the author's point about the broad nature of the application for development consent, it should be noted that the chapter referenced above also includes details of how the mitigation and good practice measures proposed will be secured.

## 6 Environmental impacts on Hintlesham Woods

6	Environmental impacts on Hintlesham Woods	<p>I believe that the project as a whole, and in particular the use of pylons around Hintlesham will cause unnecessary, additional long-term damage to the environment.</p> <p>Many of the environmental arguments seem to have been geared to justify the conclusion that Option 2 should not be pursued. But these appear skewed, incomplete and selective and contradictory.</p> <p>I do not understand why so much of the survey material and locations relate to areas that are not to be affected by the Applicant's selected route, and so much of the rationale seems to be around where the new pylons are not going. Whilst at the same time not including enough detail about where they would go.</p>	<p>The Environmental Statement (ES) included within the application for development consents provides a detailed account of the likely significant effects of the project on the environment, along with the measures the Applicant proposes to avoid, reduce or offset any significant adverse effects. ES Chapter 7 Biodiversity [APP-075] along with the other chapters which comprise the ES, include a number of proposed measures to mitigate any impacts on Hintlesham Woods.</p> <p>The scope of the ES was established through the Environmental Impact Assessment Scoping Report [APP-156], which detailed the Applicant's proposed approach to Environmental Impact Assessment. This approach was then confirmed through the Planning Inspectorate's Scoping Opinion [APP-159]. As part of this process, the Planning Inspectorate consulted a variety of organisations, such as local authorities, parish councils and the Environment Agency.</p>
---	---	---	--

## 7 Visual Impact

7	Visual impact	The Hintlesham Woods area as a whole is a beautiful, special landscape equivalent to an AONB and should be afforded the same rights.	The Applicant has considered Hintlesham Woods to be an important feature both in terms of the national designation as a SSSI and due to its ancient woodland habitat (an irreplaceable habitat). These are two factors, alongside consultation feedback and engagement with stakeholders and landowners, the findings of environmental surveys, landscape and visual impact, and further consideration of design and engineering, that were considered when choosing not to take forward Option 2.
---	---------------	--	--

Reference	Matter	Points Raised	Applicant's Comments
			<p>Paragraphs 8.9.7 to 8.9.14 of the Consultation Report [APP-134] set out in further detail the Applicant's decision to not progress with Option 2.</p> <p>The Applicant considered undergrounding of Section AB: Bramford Substation /Hintlesham and this is reported in the Connection Option Report [APP-164].</p>

## 8 Additional Questions about the Plans and Applications

8	Health	<p>Where is the evidence and what further assurances will National Grid give in respect of human health/emissions from pylons? Specifically for these potential scenarios at our home: that there would be no harm to:</p> <ul style="list-style-type: none"> <li>• A child sleeping 35m away from (multiple 400kv) lines</li> <li>• A family living 50m from lines</li> <li>• A household using garden and areas continuously under and near pylons (as close as 20-30m)</li> </ul>	<p>The Applicant has met previously with the Affected Person specifically to discuss concerns about the potential health impacts of the proposals. Following this meeting, the Applicant provided information specific to their property, including that "a worst-case scenario was calculated to demonstrate that even at maximum capacity the overhead line would not exceed the Government exposure limits set to protect members of the public." If desired, the Applicant would be pleased to arrange a follow-up meeting with the Affected Person on this topic.</p>
8	Environmental areas	<p>How was ENV04 selected and what was the rationale for its particular shape and location?</p>	<p>Chapter 6.2 of the Environmental Gain Report [APP-176] sets out how the Applicant identified potential 'Environmental Areas' for inclusion within its application for development consent. The initial locations were identified following desk-based searches and habitat condition survey site visits to identify areas within close proximity to the project that would be suitable locations for delivering habitat creation for either environmental mitigation or net gain. The initial locations and design (including shape) also took into account aspects of the local landscape character by noting existing and historic (from historic mapping) field boundaries and patterns.</p> <p>The initial Environmental Areas were discussed in a workshop with environmental organisations, including RSPB, Natural England in 2021. Further locations and refinements were suggested through these discussions and ENV04 was identified as having potentially significant ecological benefits, as it would reconnect two areas of ancient woodland that would historically have been part of the same habitat.</p> <p>ENV04 was presented in the Preliminary Environmental Information Report at the Statutory Consultation stage as an Environmental Area identified for mitigation and enhancement. Following the Statutory Consultation, the Applicant refined the design and undertook the environmental assessment on the design that forms the basis of</p>

Reference	Matter	Points Raised	Applicant's Comments
			the application for development consent. ES Chapter 7: Biodiversity [APP-075] concluded that there were likely to be significant effects due to the cumulative loss of woodland across the project. Therefore, ENV04 became an area identified as additional mitigation to mitigate this significant effect. As this is mitigation, it was re-numbered as MM09, as shown on Sheet 6 of ES Figure 16.1 [APP-155].
8	Environmental areas	What are the cost- benefits of the proposed environmental areas, other than meeting the claimed, pending statutory requirement for offset planting. How does this offset the removal of essential productive arable land?	<p>Although biodiversity net gain is not currently mandatory on Nationally Significant Infrastructure Projects, it is already required both in terms of local planning policy and as a National Grid objective. Further details can be found in Chapter 1 of the Environmental Gain Report [APP-176]. Further evidence can be found in the feedback received from consultees on the project, for example see 7.31 to 7.33 in Table 4.1 in Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and paragraph 8.7.6 in Table .1 of Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2).</p> <p>The Applicant has included areas of net gain within the Order Limits to meet its objective to deliver at least 10% net gain. The Environmental Gain Report [APP-176] acknowledges that some of the habitat gain would come at a loss of best and most versatile land, as the majority of land within the vicinity of the Order Limits is of high grade and is unavoidable.</p> <p>The Applicant notes that MM09 (formerly ENV04) is identified as additional mitigation to offset a significant effect, and not net gain. Therefore, the delivery of this habitat is required to mitigate the likely significant effects of the project as part of the planning balance when determining the acceptability of the project.</p>
8	Tourism	Has the Applicant undertaken studies on the impact of their plans on tourism and other income generators for the region?	The Applicant assessed the likely effects on socioeconomics in the Environmental Impact Assessment Scoping Report [APP-156]. This concluded that there were unlikely to be significant socio-economic effects (including on tourism) but that there could be cumulative effects with other projects. The Planning Inspectorate agreed with this position in its Scoping Opinion [APP-159].
8	Community benefits	<p>What benefit to the community, landowners and residents would there be? How many new local jobs would be created, for example? Who will actually do the construction work?</p> <p>What additional investment into the community would be made – eg roads (at least making good the additional wear/damage), energy</p>	The Socio Economics and Tourism Report [APP-066] considers how the workforce to build the project may be formed. The Applicant's experience from previous projects indicates that these workers would be split between around 10% from the local area and 90% who would travel into the area from elsewhere. Assuming an average of around 180 workers on site at any one time, this would equate to an average of 18 local workers and 162 non-local workers. A main works contractor for the project has yet to be appointed.

Reference	Matter	Points Raised	Applicant's Comments
		use, other remedial and mitigation works e.g. for pollution etc.	For those workers who would travel into the area, the Applicant estimates that they would each spend £60-70 per day on accommodation, food and other local services. For the main construction period (54 months), this would generate approximately £10,530 per day to the economy, or approximately £2.74 million per year or £12.32 million over this period in total (based on an assumed average spend of £65 per working day per nonlocal worker, and 260 working days per year).
8	Community impacts	Why do the local community and individuals have to bear the heavy and disproportionate cost of the Applicant being able to minimise its own spending, whilst it makes national and even international income from the additional lines?	The Applicant is funded by a price control mechanism which is agreed with and set by Ofgem. The Applicant pays up front the many millions of pounds it costs to build a new power transmission line. The cost is then gradually passed to customers through their electricity bills over the next 40 years. The funding for these up-front costs comes from the Applicant's shareholders and the institutions that lend the company money. This amounts to many billions of pounds across all National Grid infrastructure and investments. The shareholders invest in the Applicant because they expect that it will make a sufficient profit to provide an appropriate return on the investment and eventually pay the shareholders back. This brings a major benefit to electricity bill payers as it allows the recovery of the cost of for investment in the network to be spread out over many years, rather than having a spike in electricity bills when large new transmission connections are required. As such, it is important that when developing projects that the Applicant has regard to developing proposals that are economic and efficient, to ensure affordability for the electricity bill payer.
8	Noise, vibration and radiation	Relating to our specific situation and proposed siting: does the fact that we would be downwind of multiple high voltage cables and pylons, mean that the minimum allowed distance to our homes should be extended (against an increased risk and disturbance)? The noise, vibration and radiation would be extended over a longer area.	Construction noise and vibration impacts are assessed against threshold values, following the guidance from Code of Practice for Noise and Vibration Control on Construction and Open Sites, Annex E.3.2 (BS5228-1 and BS 5228-2). The guidance includes assessment categories and threshold values based on day of week and time of day, relative to the ambient noise level. Given the rural setting of the area, the ambient noise levels are expected to be low, and the lower thresholds would apply.
9	Financial harm	Financial harm – concerns about huge reduction in value or individual homes and the site as a whole, leading to reduction of life options and other opportunities.	All affected landowners will be compensated on a fair and reasonable basis for any rights acquired, and any impacts on the retained property will be considered in line with the Compulsory Purchase Compensation Code.
9	Harm to health	Harm to health – concerns about damage to wellbeing and increased risk of stress, and damage to physical health.	This comment was raised by the Affected Person in a previous representation. Accordingly, table 2.28 of the Applicant's Comments on Relevant Representations [REP1-025] provides the Applicant's response to concerns about the impact of the proposals and consultation process on individuals' mental and physical health.

Reference	Matter	Points Raised	Applicant's Comments
9	Environmental harm	Environmental harm – concerns about damage to wildlife, reduction of diversity, visual destruction of special landscape area, and change to nature/quality of land	As stated above, the Applicant has carefully considered the potential impacts of the project on the environment through an Environmental Impact Assessment. The findings of this assessment, along with proposed measures to avoid, minimise and mitigate any impacts, are detailed in the Environmental Assessment included within the application for development consent.
9	Physical impact	Physical impact – Construction and post-installation effects	As stated above, the Environmental Assessment ( <b>Volume 6 of the application</b> ) included within the application for development consent considers the potential construction and post-construction impacts of the project on the environment, along with proposed measures to avoid, minimise and mitigate any impacts.

## 4.5 Peter Nott [REP2-057]

Table 4.5 – Peter Nott [REP2-057]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Uncertainty due to the temporary access route	The stated purpose of the right to be acquired is to provide access, during the construction period, to the Stour Valley West CSE Compound and provision, in the long term, for access to the site should National Grid have a need to undertake substantial repair or re-building works to the infrastructure in the future.	<p>The Applicant understands that seeking permanent rights of access leads to a degree of uncertainty for individual Affected Persons however it believes this is necessary and proportionate given the importance of ensuring the integrity of the electricity transmission system.</p> <p>The Applicant has responded to this point at Table 2.13: Options and Routing- Temporary Access Route in the Applicant's Comments on Relevant Representations [REP1-025].</p> <p>The Applicant will pay compensation for any proven loss in the value of the farm.</p>
N/A	Breadth of rights and Circumstances under which rights may be exercised	the temporary haul road requirement was usurped by a 'permanent right'... further wording to the proposed HoT, introducing a provision that would allow their client the right to use the haul road route without full construction on the service of 28 days' notice, save in the case of an emergency. These changes to the rights sought have compounded the uncertainty for Mr Nott and	<p>The rights required by the Applicant are clearly set out in the DCO as class 4 (compulsory acquisition of rights - access). These rights extend to re-entry to the land to re-use the access.</p> <p>The Applicant has responded regarding the rights sought and reasons for this at Table 2.13: Options and Routing- Temporary Access Route in the Applicant's Comments on Relevant Representations [REP1-025].</p>



Reference Matter	Points Raised	Applicant's Comments
	call into question the validity of earlier consultation as the nature of what is being sought has changed significantly.	
N/A	We note that subsequent to our previous submission, National Grid have confirmed that they will not accept any amendments to the haul road route as submitted to the DCO. We also note that access has now been taken to Mr Nott's land to undertake some surveys but have not had sight of any survey results.	<p>The Applicant will continue to seek voluntary agreement of HoTs with the Affected Person until the point that the DCO is granted. This includes considering alternatives however it is the Applicant's position that the proposed route for the temporary access route off the A131 is the most appropriate proposal having regard to all the, often competing, considerations the Applicant is required to take account of.</p> <p>The Applicant has submitted at Deadline 1 the Arboricultural Impact Assessment [REP1-011/12] and the Ecological Survey of the Temporary Access Route off the A131 (document 8.3.11) and sent links to the documents to the Affected Person.</p>

## 4.6 Robert Arthur David Cowlin [REP2-036]

Table 4.6 – Robert Arthur David Cowlin [REP2-036]

Reference Matter	Points Raised	Applicant's Comments
N/A	Access Route to 132kV Pylon and New 400kV Pylon	<p>Limited consideration of change request to mitigate impact of access route. Concern about wet areas</p> <p>The Applicant understands the temporary access route being referred to is F-DAP4/ F-AP10 as shown on the Access, Rights of Way and Public Rights of Navigation Plans [APP-012]. These accesses are required to remove the existing 132kV pylons PCB66 and PCB67 and construction the new 400kV pylon RB41.</p> <p>The Applicant confirms that consideration has been given to the concerns and alternatives raised by the Affected Person prior to application and since. The applicant has sought to find a route that has the least impact including vegetation removal which is the existing corridor beneath the existing 132kV PCB conductors in this location. As shown on the General Arrangement Plans [APP-018]. The Applicant will have already accessed PCB67 and therefore a direct onward route to PCB66 is also the shortest and therefore generally less impact. The dDCO would allow micro-siting of temporary access routes within the order limits to ensure the impact on the ground at the relevant time can be minimised.</p> <p>Additionally, in relation to the 132kV removal and access to the new 400kV pylon, as shown on Sheet 16 of LEMP (document 7.8 (B)) Appendix A: Vegetation Retention and Removal Plan [APP-183], the affected vegetation is pruning (and some</p>

Reference Matter	Points Raised	Applicant's Comments
N/A	No Analysis of Alternative Access to 132kV pylon on Adjacent Land	Direct route to pylon possible from north, avoiding soft ground
		<p>coppicing) of two hedgerows and pruning and coppicing of woodland within the existing maintenance swathe. No soil stripping is proposed for access.</p> <p>Should the proposed access lie across wet ground at the time of removal, trackway would be used to protect the soil and ensure vehicles were not bogged down.</p> <p>It should also be noted that the alternative route proposed to PCB67 was not on the Affected Person's land.</p> <p>Updated HoT for an Option Agreement issued on 9 September 2023 include a commitment to undertake a record of condition to ensure that land subject to the Option Agreement is reinstated appropriately post-construction. Additionally, the rights of the Grantor to claim for compensation are not affected in lieu of the Option Agreement, thus ensuring that any fair and reasonable losses evidenced by the Grantor will be suitably compensated by the Applicant.</p>
		<p>Regarding the suggested access route from the north to PCB66 please see response above.</p> <p>Additionally, Paragraph 7.2.2 of the LEMP (<b>document 7.8 (B)</b>) states for Woodland and Tree Removal: For the removal of the 132kV overhead line, it is anticipated that there would be limited woodland lost and this would lie within the existing area used for maintenance of the 132kV overhead line underneath the current overhead line. As this is within the existing operational maintained swathe, that is currently regularly maintained to trim the height of the trees for operational electrical safety clearances.</p> <p>Paragraph 7.3.1 of the LEMP (<b>document 7.8 (B)</b>) states for Hedgerows: For the removal of the 132kV overhead line, it is anticipated that there would be limited hedgerow lost underneath the existing overhead line to be removed. It is assumed that a 5m gap will be required to allow access through the hedgerow by construction vehicles. Existing hedgerow gaps or accesses will be used where practicable. The hedgerow will be coppiced to ground level (no excavation of the rootzone) with matting placed over the soil to protect the roots.</p>

## 4.7 Simon Gilbey (Mr G V S Nott of D P Nott & Sons) [REP2-056]

Table 4.7 – Simon Gilbey (Mr G V S Nott of D P Nott & Sons) [REP2-056]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Temporary Access Route	Consultation	<p>The Applicant has sought to engage with the Affected Person and their Agents and has had many meetings and discussions in person by email and telephone to detail the project, the Applicant's proposals and listen to the Affected Person's concerns. Formal HoT for a voluntary agreement on this route were issued to the Affected Person's Agent on 8 March 2023.</p> <p>The Applicant met the Affected Person on 24 August 2022 in advance of the targeted consultation to discuss the project.</p> <p>The Applicant also attended the Parish Council meeting at which the Affected Person was present. The Applicant suggested it may be possible to use the highway network for the route at a meeting with the Affected Person in September 2022, but further study of the local road network ruled this out. Accordingly, the Applicant proposed HoT which were sent to the Affected Person's Agents on 8 March 2023.</p> <p>Meetings were held with the Agents to discuss amendments to the HoT and the Affected Person's concerns along with receiving alternative routing proposals on 5 April, 14 June, and with the Affected Person and their Agents on 10 July and with telephone calls and email correspondence on the HoT in between and after these meetings.</p>
N/A		National Grid has not been clear on their requirements from the outset	<p>The Applicant confirms the classes of rights requested for the Affected Person's land have not changed since DCO submission.</p> <p>At Statutory Consultation in January 2022, the Applicant stated (in its Project Background document) that it would submit an application to the Planning Inspectorate, seeking development consent for the reinforcement and associated development and including other statutory powers to facilitate, amongst other things, the compulsory acquisition of land and rights. At the Targeted Consultation in September 2022 and additional landowner consultation in February 2023, similar wording was included in the consultation materials, notices and letters to the Affected Person.</p>
N/A		Purpose of the Development Consent Order  The Rights required	<p>The Applicant's HoT sent to the Affected Person in March 2023 were clear that rights to return to reuse the Temporary Access Route were included.</p> <p>The Applicant requires the rights to build the temporary access route across the Affected Person's three fields, to remove it after energisation of the project and restore the land to full agricultural productivity, but also in event that there be equipment failure, accidental or deliberate damage or other cause requiring the delivery of a significant number of very large</p>

Reference	Matter	Points Raised	Applicant's Comments
			<p>loads to the Project area for repairs or rebuilding works the Applicant requires the rights at a future date to reinstate the haul road to secure access to the project and remove it again, making good after works are complete.</p> <p>Further, should any future works require only a few very large loads, the impact and cost of full reconstruction of the haul road would not be justified and the Applicant requires the rights to lay a temporary trackway on the same route, again removing it and making good after works are complete.</p>
N/A		National Grid did not fully explore the concerns of the landowners prior to submission of the DCO.	<p>The Applicant notes that the Affected Person was advised of the proposed temporary access route at a meeting on 24 August 2022 and in September 2022 undertook a targeted consultation which included proposals for a temporary access route off the A131. Further landowner consultation was undertaken in February 2023 on slightly amended proposals following feedback from the targeted consultation. For full details of the consultations undertaken, the scope and those consulted reference should be made to the Consultation Report [APP-043].</p> <p>In addition to the above formal consultation the Applicant was in regular communication with the Agent and family of the Affected Person.</p> <p>The outcome of the Applicant's assessment of the alternatives was that neither a highway only or a hybrid (part highway, part temporary access route) would allow the proposed development to be delivered in an appropriate manner. A summary is presented in the Technical Note on Temporary Access Route off the A131 (<b>document 8.5.5</b>).</p>
N/A		Ecology	<p>As noted in Table 3.1 in the Applicant's Response to Rule 9 Letter Dated 24 July 2023 [AS-005], the baseline habitat information presented within the ES [APP-075] was based on desk study information, including project data searches from the Local Records Centre. High resolution aerial imagery was used to support the baseline assessment. This showed that the temporary access route crosses arable fields with hedgerows as described in ES Appendix 7.1: Habitats Baseline Report [APP-109] and shown on Habitats of Protected Species and Important Habitats [APP-014].</p> <p>The ecological verification surveys undertaken in August 2023 and the survey results can be found in the Ecological Survey of the Temporary Access Route off the A131 [REP1-036] submitted at Deadline 1. As stated in paragraph 3.1.2 of the Ecological Survey of the Temporary Access Route off the A131, the surveys confirm that the temporary access route off the A131 passes through arable fields, which are low ecological value habitats. This confirms the assumptions made in the ES at Appendix 7.1: Habitats Baseline Report [APP-109].</p> <p>An arboricultural survey of the temporary access route off the A131 was also undertaken in August 2023. The results are presented in the updated Arboricultural Impact Assessment</p>

Reference	Matter	Points Raised	Applicant's Comments
			<p>[REP1-012] published at Deadline 1. This confirms that no veteran trees are likely to be affected as a result of the proposed temporary access route off the A131.</p> <p>The LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] submitted with the application for development consent included the vegetation likely to be affected from the temporary access routes and visibility splays along the A131 on Sheet 30.</p> <p>The Applicant does not intend to update the ES, as the findings of the verification surveys align with the assumptions that were made in the ES and would not alter the assessment conclusions in the ES.</p>
		Alternative proposal	The Applicant's response is detailed in the Technical Note on Temporary Access Route off the A131 ( <b>document 8.5.5</b> ).
		HoT for the option agreement and dead of easement	<p>The Applicant has been and will continue to negotiate voluntary HoT with the Affected Person and hopes to find resolution before the end of the examination.</p> <p>The Applicant notes that the Deed of Grant of Easement will reflect the Heads of Terms, once agreed.</p>
Annex	ECC letter dated 19 October 2022 reference	N/A	The Applicant is in discussion with Essex Highways with regards to temporary access routes. Further details can be found in the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report ( <b>document 8.5.3.2</b> ).

## 4.8 Nigel Heyworth Morgan [REP2-044/045]

Table 4.8 – Nigel Heyworth Morgan [REP2-044/045]

Reference	Matter	Points Raised	Applicant's Comments
N/A	Superconducting Cable Option	The project should be refused on the basis that a superconducting cable option should be taken forward.	<p>The use of High Temperature Superconductor (HTS) cables has been considered by National Grid as referenced in Section 3.5.6 of the ES Main Report Chapter 3 - Alternatives Considered [APP-071].</p> <p><b>Alternating Current (AC) High Temperature Superconductors:</b></p>

Reference Matter	Points Raised	Applicant's Comments
		<p>This technology is currently being used to provide power transfer over short distances in urban-constrained environments only and they presently operate at voltages well below 400kV. The current status of AC HTS is not at a level where it can provide the capacity, voltage level, or distance required by the project and currently has extensive limitations. The National Grid Group is actively involved in the development of AC superconducting technology. The group is made up of a number of companies of which National Grid Electricity Transmission is one. National Grid USA owns a superconductor circuit in Albany, New York as acknowledged by Mr Morgan in his Written Representation [REP2-044]. This AC superconductor was one of the first in the world and is 350m long, operating at 34.5kV with a current rating of 800A. It operates in a very congested urban area.</p> <p>As part of National Grid's active involvement in the development of AC superconducting technology, National Grid Electricity Transmission recently partnered with Nexans, the cable manufacturer referenced by Mr Morgan in his Written Representation, and American Super Conductors to investigate possibilities for superconducting cable projects within the UK. To date the maturity of the HTS technology has not allowed the identification of projects that could be progressed at either 275kV or 400kV.</p> <p><b>High Voltage Direct Current (HVDC) High Temperature Superconductors:</b></p> <p>This technology has been developed, but as with all HVDC projects it is not only the cost of the cable that needs to be considered. Each end of any connection will require a HVDC convertor station and connections into the AC system. Because of the cost of cables and convertor stations, HVDC technology of any kind is not usually economic for distances less than 100km, as is the case for the project and would not meet the Applicant's statutory duty to be economic and efficient. The converter stations could also have potential for landscape and visual effects depending on where these are located.</p> <p>The Applicant therefore remains of the view that both HTS cable technologies (AC and HVDC) are not suitable for use on the project for the reasons given above, and therefore the chosen standard cable technology is the appropriate decision.</p>

**Page intentionally blank**

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)