



## Application by National Grid Electricity Transmission Plc for the Bramford to Twinstead Reinforcement

### The Examining Authority's further written questions Issued on 22 December 2023

The following table sets out the Examining Authority's (ExA's) further written questions (ExQ2).

Responses are due by Deadline 7 in the Examination Timetable, which is **Wednesday 17 January 2024 at 11.59pm**.

The list of questions is set out in a topic-based framework, which is generally based on the ExA's Initial Assessment of Principal Issues provided as Annex C to the ExA's Rule 6 letter of 7 August 2023. The framework of issues set out there has been developed in accordance with matters that have arisen from representations. The answers provided will contribute to the ExA's examination and assessment of the application against relevant policy.

Column 1 of the table provides a unique reference number for each question, which follows the convention set in the Examining Authority's first written questions. This starts with a topic code, then a '2' (for ExQ2), followed by a section number (for that topic), and finally an individual question number. When answering a question, or in any future representations, please ensure that you quote this unique reference number.

Column 2 indicates the party (or parties) that the question is directed to. The ExA requests all named parties to answer all questions directed to them, providing either a clear and suitably substantive response, or reasons why the question cannot be answered or is not relevant to them. This does not preclude an answer being provided by any other party, if that party believes they have additional information on that specific topic or point that would be useful to the Examination.

If you consider that you have already addressed part or all of a question in full in a submission at Deadline 6, you can simply provide a signpost to that information as a response.

If you are answering a limited number of questions, responses in a letter format are appropriate. If you are answering several or many questions, it will assist the ExA if you use a table based on that set out below. An editable version of this table in Microsoft Word is available from the Planning Inspectorate. Please email your request to the Case Team at [bramfordtotwinstead@planninginspectorate.gov.uk](mailto:bramfordtotwinstead@planninginspectorate.gov.uk) and include 'Editable ExQ2 Table' in the subject line of your email.



### Frequently used abbreviations:

<b>AOD</b>	Above Ordnance Datum	<b>ExQ2</b>	Further written questions
<b>AONB</b>	Area of Outstanding Natural Beauty	<b>ha</b>	Hectare(s)
<b>BMV</b>	Best and Most Versatile	<b>HRA</b>	Habitats Regulations Assessment
<b>BS</b>	British Standard	<b>LEMP</b>	Landscape and Ecological Management Plan
<b>CEMP</b>	Construction Environmental Management Plan	<b>LIR</b>	Local Impact Report
<b>CoCP</b>	Code of Construction Practice	<b>LOAEL</b>	Lowest Observable Adverse Effect Level
<b>CTMP</b>	Construction Traffic Management Plan	<b>NOEL</b>	No Observable Effect Level
<b>dB</b>	Decibels	<b>NPS</b>	National Policy Statement
<b>dDCO</b>	Draft DCO	<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>Defra</b>	Department for Environment, Food and Rural Affairs	<b>NSR</b>	Noise sensitive receptors
<b>DMRB</b>	Design Manual for Roads and Bridges	<b>REAC</b>	Register of Environmental Actions and Commitments
<b>EIA</b>	Environmental Impact Assessment	<b>SOAEL</b>	Significant Observed Adverse Effect Levels
<b>ES</b>	Environmental Statement	<b>SoCG</b>	Statement of Common Ground
<b>ExA</b>	Examining Authority	<b>SSSI</b>	Site of Special Scientific Interest
<b>ExQ1</b>	First written questions	<b>tCO<sub>2e</sub></b>	Tonnes of carbon dioxide equivalent

### The Examination Library

References in these questions set out in square brackets (e.g., '[APP-010]') are to documents catalogued in the Examination Library. The Examination Library will be updated as the Examination progresses. Please include the Examination Library unique reference when referring to any document in your reply.

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<b>0. Miscellaneous and general</b>		
General and cross-topic		
MG2.0.1	The Applicant	Scoping Table ID 4.11.4 [APP-159] refers to consideration of direct and indirect impacts on the physical and mental health of receptors, as well as the potential for effects on any vulnerable populations. Can you signpost and confirm any likely significant effects (including intra-project and inter-project cumulative effects) on mental health during the pre-construction, construction, operation and decommissioning stages?
Legislation and policy		
MG2.0.2	The Applicant and all IPs	On 22 November 2023, the Department for Energy Security and Net Zero published an updated version of the draft National Policy Statements for Energy (NPS EN-1 to NPS EN-5). These include some changes relating to the decision-making process for low carbon generation NSIP applications and electricity connections. The revised draft Statements have been laid before Parliament but were yet to be designated at the time of the publication of these ExQ2. Do any parties have any comments on the potential effect of the changes set out in the relevant November 2023 draft versions of the Energy National Policy Statements on matters related to this application, compared to the March 2023 draft versions of the Energy National Policy Statements?
MG2.0.3	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	The Government published an updated National Planning Policy Framework accompanied by a written ministerial statement on 19 December 2023. Do you have any comments on the potential effect of the changes this brings to the wider planning policy framework on matters related to this application?
MG2.0.4	The Applicant	Can you advise if and how your assessment of the Proposed Development considered the Kunming-Montreal Global Biodiversity Framework?
MG2.0.5	Essex County Council	Can you provide a progress update on the current review of the Essex Minerals Local Plan and whether there are likely to be any changes in mineral land use policy within the Order Limits of the Proposed Development ([REP1-039], paragraph 5.2.3)?

Reference	Question to:	Question
MG2.0.6	The Applicant	Can you advise on the implications of the Leavenheath Neighbourhood Plan (made in July 2023) for the EIA?
MG2.0.7	The Applicant	Can you advise how the assessment considered the following Assington Neighbourhood Plan policies, as they have not been referred to in the Local Planning Policy section of the ES [APP-089]: ASSN9 Dark Skies; ASSN13 Assington Special Character Area; and ASSN14 Design Considerations.
MG2.0.8	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	What weight do you consider should be given in this Examination to the Department for Energy Security and Net Zero publication <i>Transmission Acceleration Action Plan - Government response to the Electricity Networks Commissioner's report on accelerating electricity transmission network build?</i>
MG2.0.9	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	What policy weight do you consider should be given in this Examination to the Department for Levelling Up, Housing and Communities' policy paper <i>Getting Great Britain building again: Speeding up infrastructure delivery</i> (November 2023)?
MG2.0.10	The Applicant	Can you summarise how the ES has satisfied the requirement in the Overarching National Policy Statement for Energy (NPS EN-1) (paragraph 5.10.5) to: identify any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing; and, to assess any effects of precluding a new development or use proposed in the development plan.

Reference	Question to:	Question
<b>The Proposed Development</b>		
MG2.0.11	The Applicant	Further to your response to ExQ1 MG1.0.17 [REP3-052] in relation to trenchless crossings, can you explain the reference to 'proposed' in the REAC ([REP4-018] EM-E05, EM-G04, EM-G08) and in the legend of work plans [APP-010]. Is this a commitment to provide trenchless crossings at the locations shown (rather than a suggestion)? Briefly confirm how trenchless crossings would be secured at these locations.
MG2.0.12	The Applicant	Further to your response to ExQ1 MG1.0.20 [REP3-052], can you confirm that the reference to 'proposed' in the legend of work plans [APP-010] is a commitment to remove overhead lines at the locations shown (rather than a suggestion)?
MG2.0.13	The Applicant	Further to your response to ExQ1 MG1.0.1 [REP3-052] and with reference to Table 2.1 in the CEMP [REP3-024], can you provide a progress update on the status of these consents, licences and permits?
<b>Alternatives</b>		
MG2.0.14	The Applicant	Without prejudice to the weight to be attached to the provisions of the November 2023 draft National Policy Statement for Electricity Networks Infrastructure (NPS EN-5), can you advise if due consideration has been given to the matters set out in paragraphs 2.9.14 and 2.9.15 in relation to alternatives to overhead lines? If so, can you signpost where the outcome can be seen?
<b>Socio-economics and other community matters: employment</b>		
MG2.0.15	The Applicant	In its response to the Applicant's comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impacts Reports, Suffolk County Council ([REP4-008] reference 15a) requested you to undertake further work to define the skills needed within your workforce and to compare the outcome to the skills available within the local labour market. Can you comment on this request for a workforce assessment and provide an evidence-based approach to sourcing local labour?
MG2.0.16	The Applicant	Can you advise whether an Employment, Skills and Education Strategy is being prepared for the proposed project? If not, why not?
<b>Socio-economics and other community matters: businesses</b>		
MG2.0.17	The Applicant	Suffolk County Council made a request in its LIR ([REP1-045] paragraph 12.10) for you to demonstrate that the Proposed Development would not cause disruption or delays on the A12 or wider strategic road network, which could then have an impact on businesses in Suffolk. Can you respond to this request?

Reference	Question to:	Question
<b>Socio-economics and other community matters: local residents and community</b>		
MG2.0.18	The Applicant	In response to the Planning Inspectorate's scoping opinion comments at ID 4.10.16 (Effects on access to community services during operation and construction) [APP-159], can you confirm the capacity of the healthcare facilities listed in Table 3.8 of ES Appendix 15.1 [APP-140] and provide your assessment of any resulting impacts?
<b>1. Air quality and emissions</b>		
AQ2.1.1	The Applicant	Can you summarise and signpost the indirect potential impacts of the proposed construction works on health matters such as asthma through the release of dust, dirt, gases and any other emissions?
AQ2.1.2	The Applicant	Paragraph 3.1.1 of your Greenhouse Gas Assessment [APP-092] refers to a total 111,484 tCO <sub>2</sub> e for the project (84,050 tCO <sub>2</sub> e construction and 26,133 + 1,301 tCO <sub>2</sub> e operational). Paragraph 5.3.4 of the November 2023 draft Overarching National Policy Statement for Energy (NPS EN-1) states that a whole life greenhouse gas assessment should be included in the ES. Does the ES fully meet these expectations, including the decommissioning phase? If not, why not?
AQ2.1.3	The Applicant	Paragraph 5.3.4 of the November 2023 draft Overarching National Policy Statement for Energy (NPS EN-1) promotes the reduction of climate change impacts. Can you summarise or signpost any steps that you have taken to reduce climate change impacts during the construction, operation, and decommissioning phases of the Proposed Development?
AQ2.1.4	The Applicant	With reference to paragraph 5.3.4 of the November 2023 draft Overarching National Policy Statement for Energy (NPS EN-1), is it your intention to voluntarily offset or remove any residual greenhouse gas emissions using a recognised framework?
AQ2.1.5	The Applicant	Can you comment on whether your assessment would comply with paragraph 5.3.7 of the November 2023 draft Overarching National Policy Statement for Energy (NPS EN-1) that notes that steps to minimise and offset emissions should be set out in a greenhouse gas reduction strategy, secured through any DCO? If it would not, should it?
AQ2.1.6	The Applicant	The November 2023 draft Overarching National Policy Statement for Energy (NPS EN-1) states that applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance. Can you confirm if your assessment needs to be updated?
AQ2.1.7	The Applicant	Can you summarise the effects on the air quality assessment if the latest background pollutant concentrations from the Defra data archive were used?
<b>2. Approach to the EIA and the ES</b>		
EA2.2.1	The Applicant	Further to your response to ExQ1 EA1.2.5 [REP3-052] that you consider it to be reasonable to conclude that decommissioning impacts would be no worse than those assessed for construction, did you take into account that while the magnitude of change associated with activities to be undertaken in decommissioning may be similar to those undertaken during construction, the sensitivity of the receiving environment and receptors may have changed materially?



Reference	Question to:	Question
EA2.2.2	The Applicant	Can you expand on your comments in your response to East Anglia THREE Limited that you welcome the information provided about works to the convertor station and Bramford substation (CM1.5.10 [REP4-029]) and explain how you have considered its impact on the baseline construction schedule [APP-091] and cumulative effects, particularly noise and vibration, air quality, and public rights of way?
<b>3. Biodiversity, ecology and nature conservation, including HRA matters</b>		
EC2.3.1	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council Natural England	The November 2023 draft National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) notes at paragraph 2.10.8 that long-term management of mitigation schemes is essential and that the relevant management plan should include a realistic timescale to secure the integrity and benefit of landscape and biodiversity commitments made to achieve consent. To what extent do you believe this draft policy is important and relevant to the Examination?  Do you consider the current commitments made in relation to the maintenance and aftercare of mitigation planting and Biodiversity Net Gain measures (summarised, for example, in the Applicant's response to comments from the Essex councils at Deadline 5 [REP5-025]) sufficient to meet this policy aspiration?
EC2.3.2	The Applicant	You are proposing mitigation planting at or near to several sensitive locations to buffer or improve habitat connectivity – at Hintlesham Woods and the grid supply point substation, for example. Have you considered the benefits of bringing this planting forward in your programme in areas that are otherwise unaffected by construction activities? If you do not feel this is achievable, please explain why. If you feel it is achievable, can you identify the suitable locations, how it could be secured, and whether you are willing to commit to it?
EC2.3.3	The Applicant Natural England	Can you provide an update on negotiations [REP5-038] about the commitment (EM-AB17) to restrict construction works and ongoing maintenance at Hintlesham Woods SSSI to the existing maintenance swathe and the corresponding updating of the LEMP and REAC at Deadline 6 [Examination Library references to be confirmed]? Can you indicate if and when this may be shown as resolved in your SoCG?
EC2.3.4	The Applicant	Your Deadline 5 Statement of Common Ground with Natural England [REP5-013] records discussions between the Applicant and Natural England's wildlife licensing team in relation to the draft dormouse licence. When might the final position be submitted into Examination?

Reference	Question to:	Question
EC2.3.5	The Applicant	Further to your response to ExQ1 [REP3-052] in relation to compound lighting and task lighting for winter working anywhere within the Order Limits, can you expand on your answer to demonstrate specifically where and how the potential impacts of these light sources were considered for sensitive wildlife and biodiversity receptors? Could this include a response to the request in Natural England's Written Representation [REP2-026] to confirm how your commitments to lighting and hedgerow protection would be secured?
EC2.3.6	Mr Nick Miller	Following your helpful submission of wildlife records into the Examination, the Applicant [REP4-029] has confirmed that it was aware of the sensitive habitats that you highlight in the Stour Valley and that these were a key consideration when it committed to undertake a trenchless crossing to the south of Ansell's Grove, which would not disturb the land surface or habitats in that area. This is secured as embedded measure EM-G08 in the REAC [REP4-018]. With this mitigation in mind, are you now content with the Applicant's assessment in this respect?
EC2.3.7	Environment Agency Natural England	The Applicant has said that it considers the Environment Agency to be the HRA competent authority with regards to the Hydrogeological Risk Assessment [REP5-013]. Natural England acknowledges that the Environment Agency is the relevant authority in relation to matters relating to groundwater and surface water quality but notes that it should be an advisor to other competent authorities in its role as the 'nature conservation body' (Regulation 5 of the Conservation of Habitats and Species Regulations 2017 (as amended)). It therefore considers it must be consulted on the hydrogeological risk assessment. What process would be followed to ensure this?
<b>4. Compulsory Acquisition, Temporary Possession and other land or rights considerations</b>		
CA2.4.1	Robert Arthur David Cowlin	The Applicant's Comments on Written Representations ([REP3-048] pages 69 and 70) responded to your various concerns. Does the response allay them? If referring to specific features or suggested alternative routes in your response, can you clearly show these on a map or plan, such as by the annotation of a copy of Sheet 16 of the Applicant's Access, Rights of Way and Public Rights of Navigation Plans [APP-012] or the Work Plans [APP-010]?
CA2.4.2	Simon J Gilbey on behalf of GVS Nott (trading as D P Nott & Sons)	The Applicant assessed your preferred route for the proposed haul road from the A131 to the Stour Valley west cable sealing end compound in its Technical Note on Temporary Access Route off the A131 [REP4-009], which it refers to as Option 3c: Southern Variation of Option 2a for G Nott. Do you want to comment any further on its analysis and conclusions?
CA2.4.3	Land Partners LLP on behalf of Peter Nott	The Applicant assessed your preferred route for the proposed haul road from the A131 to the Stour Valley west cable sealing end compound in its Technical Note on Temporary Access Route off the A131 [REP4-009], which it refers to as Option 2e: Variation of Option 2a for P Nott. Do you want to comment any further on its analysis and conclusions?
CA2.4.4	Francis Prosser	You are not listed in the Book of Reference [REP4-037]; is it correct in this respect?

Reference	Question to:	Question
CA2.4.5	Francis Prosser	The Applicant has amended the Book of Reference [REP4-037] in respect of Plots 6-21 and 6-29. Are you satisfied that the amended entries correctly reflect parties with rights in that land?
CA2.4.6	Francis Prosser	In the Applicant's Comments on Other Submissions received at Deadline 3 [REP4-022] at Table 3.1.2 (Comments on Francis Prosser Deadline 3 Submission, pages 14-18), it responds to issues raised in your submission [AS-008]. Do you wish to comment on the Applicant's responses in respect of the following? <ol style="list-style-type: none"> <li>1. Proposed temporary access and use of land off A1071 (page 14).</li> <li>2. Need for proposed temporary access, including alternative to proposed temporary access and use of land off A1071.</li> <li>3. Scale of proposed temporary access and use of land off A1071.</li> <li>4. Land impact of proposed temporary access and use of land off A1071.</li> <li>5. Proposed temporary access and use of land off A1071 (page 16).</li> <li>6. Consultation on proposed temporary access and use of land off A1071.</li> <li>7. Changes of definitions.</li> </ol>
CA2.4.7	Robert Shelley	Does the updated Book of Reference submitted at Deadline 4 [REP4-036] correctly reflect your interests in land that might be affected by the Proposed Development?
CA2.4.8	The Applicant	If sited within the area that is subject to Policy ASSN10 Local Green Spaces of the Assington Neighbourhood Plan 2018-2036, how might the existing pylon PCB 67, shown on Work Plan 16 [APP-10], compare in terms of scale (including footprint and height) and base level AOD to the proposed pylon RB41 when the maximum lateral and height tolerances allowed by Article 5, Limits of Deviation of the dDCO, are applied [REP5-005]?
CA2.4.9	The Applicant	Can you address the specific comments made by Assington Parish Council [REP3-059] and Babergh and Mid Suffolk District Councils [REP3-060] about the potential comparative effect on landscape character and associated visual impact of the existing pylon on the area that is subject to Policy ASSN-10 Local Green Spaces of the Assington Neighbourhood Plan 2018-2036 and that which may be sited thereon? In doing so, address the 'worst-case' scenario in terms of scale and the highest potential spot height within the Order Limits where they overlap with the designation.
<b>5. Construction matters</b>		
General construction matters		
CM2.5.1	The Applicant	Further to your response to ExQ1 CM1.5.1 [REP3-052] and Action Point 10 from Issue Specific Hearing 1 [REP1-034], can you confirm which year and quarter the archaeological works would commence and finish for baseline construction schedule [APP-091], and the worker profile numbers associated with archaeological work?
CM2.5.2	The Applicant	Further to your response to ExQ1 CM1.5.2 [REP3-052], can you describe the effects on the outcome of the EIA if connections for utilities are not in place at the main site compound for a short period, and if not in place during the construction period?

Reference	Question to:	Question
CM2.5.3	The Applicant	Further to your response to ExQ1 CA1.4.21 [REP3-052], can you confirm the maximum height of the temporary construction compounds listed in Table 4.1 of the CEMP [REP3-024]?
CM2.5.4	Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council Natural England	Further to Applicant's response to Action Point 9 at Issue Specific Hearing 1 [REP1-034], and to the discussion in Issue Specific Hearing 5, can you confirm your position in relation to the use of phrases or words such as 'severe weather conditions', 'disrupted', 'interrupted', and 'delayed', especially if you believe them to be insufficiently precise to justify operations taking place outside the core working hours? (Replicated in paragraph 2.3.1 (2) of the CEMP [REP3-024]).
<b>6. Draft Development Consent Order</b>		
DC2.6.1	The Applicant	Article 14(2), Power to alter layout, etc. of streets, refers to alteration of the layout of any street, including ancillary works, <i>'whether or not within the Order limits'</i> . Can you confirm that any such works outside the Order Limits would be limited to the public highway and would not impinge on land in other ownership?
DC2.6.2	The Applicant Suffolk County Council Essex County Council	Should references in Article 15, Temporary stopping up of streets and public rights of way, to 'stopping up', stop up' and 'stopped up' refer to 'closure', 'close' and 'closed' respectively for the sake of clarity and accuracy?
DC2.6.3	The Applicant	Can you advise if the provisions of Article 15(1), Temporary stopping up of streets and public rights of way, would potentially extend associated works beyond the Order Limits and onto land that was not within the public highway?
DC2.6.4	The Applicant	<ol style="list-style-type: none"> <li>1. Notwithstanding precedent that you have cited in section 3.19 5 of the Explanatory Memorandum [REP3-009], can you justify why the powers that would be conferred by Article 15, Temporary stopping up of streets and public rights of way, are considered appropriate and proportionate, having regard to the impacts of authorising temporary working sites in these streets on walkers, cyclists and horse riders?</li> <li>2. Did your Equality Impact Assessment [REP3-047] take account of the potential scope of operation Article 15?</li> </ol>

Reference	Question to:	Question
DC2.6.5	Suffolk County Council Essex County Council	Are you content with the scope of powers sought to authorise alteration and use as a temporary work site of any street or public right of way that has been temporarily stopped up, altered or diverted under the powers conferred by Article 15, Temporary stopping up of streets and public rights of way, whether or not within the Order Limits? If not, can you propose alternative draft wording or, if included elsewhere, signpost it?
DC2.6.6	Suffolk County Council Essex County Council	In respect of Article 15, Temporary stopping up of streets and public rights of way, are you satisfied that the information in Schedule 7, together with the Access, Rights of Way and Public Rights of Navigation Plans [APP-012] would provide you with sufficient information in your role as street authority?
DC2.6.7	The Applicant	The ExA notes that by virtue of Schedule 15(4) of the dDCO [REP5-005] you are seeking to disapply cited provisions of the Neighbourhood Planning Act 2017. Nevertheless, the prospective provisions of Section 20(3) would give at least 3 months' notice of temporary possession of land. In contrast, Articles 26(2) and 27(2) of the dDCO would provide for 14 days and Article 28(3) for 28 days. Your explanation at paragraph 3.306 of the Explanatory Memorandum [REP5-007] is noted in respect of Article 26, as is your response to ExQ1 DC1.6.46 and ExQ1 DC1.6.47 [PD-005] in your associated Response to First Written Questions [REP3-052]. However, in this context, are these notice periods reasonable and equitable?
DC2.6.8	Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	In respect of Article 53, Safeguarding, can you advise: <ol style="list-style-type: none"> <li>1. What would registration of the provisions of Article 53 as a local land charge entail? For example, would it involve registration of the charge in the Applicant's favour on an individual plot of land on a folio-by-folio basis?</li> <li>2. Once the charge was registered with HM Land Registry, would the council have to undertake a separate data entry exercise in respect of updating its digital mapping database etc and what would this entail?</li> <li>3. What would be the attendant implications for staff resources?</li> <li>4. Once the charge was registered on the council's database etc, would the Applicant automatically appear on a statutory list of consultees for individual planning applications on land subject to the charge?</li> <li>5. Would the Applicant's addition as a statutory consultee involve any additional staff time when consultations are being carried out on a planning application? If so, what would this involve?</li> <li>6. If the councils and Applicant were to be amenable to entering into a Planning Performance Agreement to address the administrative task that Article 53 of the dDCO would involve, how would this be secured?</li> </ol>
DC2.6.9	The Applicant	Article 53(3), Safeguarding, suggests that if the Order for which consent is sought was made, the local planning authorities would have to give notice to the undertaker of all current, undetermined planning applications to which Articles 53(1) and (2) apply rather than to those received on or after that date. If that is the intended interpretation: <ol style="list-style-type: none"> <li>1. Is this a fair, reasonable and proportionate duty to impose on them?</li> <li>2. In terms of potential delay to the determination of current planning applications, is it fair, reasonable and proportionate to applicants?</li> </ol>

Reference	Question to:	Question
DC2.6.10	The Applicant	Is the approximate area given for each temporary construction compound in Table 4.1 of the CEMP [REP3-024] consistent with the zone shown for temporary construction compounds on the General Arrangement Plans [APP-018]?
DC2.6.11	Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	Subsequent to amendment of the CEMP [REP3-025] by insertion of Table 4.1, are you satisfied that there is sufficient control in the dDCO over the siting of the proposed temporary construction compounds? If not, precisely how is it considered to be deficient or unclear and how might perceived issues or omissions be addressed?
DC2.6.12	Essex County Council Braintree District Council	In your LIR ([REP1-039] paragraph 21.5.10), you referred to the need for a Requirement relating to the external appearance of the proposed temporary construction compounds. Can you advise: 1. Why you perceive a need for such detail given that they would be temporary? 2. What details you consider necessary other than the colour of the security fencing that you mention in your response to Applicant's comments on the Essex councils' LIR and other documents ([REP4-049], item 5)? 3. The particulars of any relevant precedent for such a Requirement?
DC2.6.13	Essex County Council Braintree District Council Suffolk County Council Babergh and Mid Suffolk District Councils	Can you provide a further response about the content of the following management plans, without prejudice to any view that you might hold that these should be treated as outline plans that would need to be detailed post-consent by the local planning authority, and the ExA's ultimate recommendation on this matter? Can you summarise or signpost what further information would be necessary in your opinion to make each of these plans sufficiently detailed to represent final versions and thus to allow you the necessary control over the construction and associated activities should the DCO be made? (Further to the example of the LEMP in the councils' joint Landscape and Ecological Management Plan Document Review [REP5-035] and the subsequent Deadline 6 submission from Suffolk County Council, Additional Evidence relating to the Landscape and Ecological Management Plan [Examination Library reference to be determined]). (a) Construction Environmental Management Plan. (b) Materials and Waste Management Plan. (c) Construction Traffic Management Plan. (d) Landscape and Ecological Management Plan. (e) Public Rights of Way Management Plan.

Reference	Question to:	Question
DC2.6.14	The Applicant	<p>Without prejudice to the ExA's ultimate recommendation on the matter, if the following management plans were to be accepted as the final control documents at the close of the Examination, can you further explain how their controls would be implemented, monitored and (if necessary) enforced by the local authorities in each case? Include consideration of: the information that would be collected and the frequency of its collection; the procedures to identify, report and correct non-compliance; and, the arrangements for communicating a need for rectification and the timelines for doing so. The management plans referred to are:</p> <p>(a) Construction Environmental Management Plan.                      (b) Materials and Waste Management Plan.                      (c) Construction Traffic Management Plan.                      (d) Landscape and Ecological Management Plan.                      (e) Public Rights of Way Management Plan.</p>
DC2.6.15	The Applicant Essex County Council Braintree District Council Suffolk County Council Babergh and Mid Suffolk District Councils	<p>Without prejudice to your views or the ExA's ultimate recommendation on the matter, if the following management plans were amended to constitute outline versions that would need to be detailed and submitted after the making of any DCO, are you able to agree a set of deliverables for each plan that would need to be approved by the relevant local planning authorities together with any necessary additional stages and timescales? (Further to the example of the LEMP in the councils' joint Landscape and Ecological Management Plan Document Review [REP5-035] and the subsequent Deadline 6 submission from Suffolk County Council, Additional Evidence relating to the Landscape and Ecological Management Plan [Examination Library reference to be determined]). The plans in question are:</p> <p>(a) Construction Environmental Management Plan.                      (b) Materials and Waste Management Plan.                      (c) Construction Traffic Management Plan.                      (d) Landscape and Ecological Management Plan.                      (e) Public Rights of Way Management Plan.</p>
DC2.6.16	The Applicant	<p>Without prejudice to your position on the status of control documents listed in Requirement 4, Management plans of the dDCO [REP5-005], can you submit draft revised wording for Requirement 4 that would treat the submitted plans as outline versions and tie submission of the final versions of control documents listed in Requirement 4(2) to stages of the proposed development in accordance with Requirement 3, Stages of authorised development? This should also provide for any updates to those documents to be submitted to the relevant planning authority in accordance with Requirement 3(3). The management plans referred to are:</p> <p>(a) Construction Environmental Management Plan.                      (b) Materials and Waste Management Plan.                      (c) Construction Traffic Management Plan.</p>

Reference	Question to:	Question
		(d) Landscape and Ecological Management Plan. (e) Public Rights of Way Management Plan.
DC2.6.17	Suffolk County Council	Your LIR [REP1-045] noted that decommissioning and removal routes require careful consideration and your responses to ExQ1 [REP3-078] suggested wording for an associated Requirement (your reply to DC1.6.119 [PD-005]). Nevertheless, can you concisely explain why you perceive Requirement 12, Decommissioning, to be deficient as written?
DC2.6.18	Suffolk County Council	In your response to ExQ1 [REP3-078], you responded to DC1.6.119 by reproducing an extract from the East Anglia ONE North Offshore Wind Farm Order 2022. Can you explain: 1. If the wording under the header ' <i>onshore decommissioning</i> ' would replace or supplement Requirement 12 in the dDCO [REP5-005]? 2. Albeit that your suggested additional or replacement wording is reproduced from a made DCO, why is it considered appropriate in this instance? 3. Why each of the component parts are considered necessary in this instance?
DC2.6.19	Essex County Council Braintree District Council	Can you clarify three outstanding points arising from your response to ExQ1 DC1.6.97 in your Deadline 3 Response to ExA Questions 1 [REP3-061] in respect of your suggestion that a Requirement is needed in respect of lighting: 1. Is there a formally designated Dark Sky Area along the line of the Proposed Development or in its immediate vicinity? 2. Is residential amenity the basis of your concern in seeking additional controls over lighting or were you using the term in a broader sense? 3. Where you refer to biodiversity, are bats your sole concern? 4. Aside from your ongoing concerns about the draft nature of management plans subject of Requirement 4, in what way do you consider section 6.4 of the CEMP [REP3-024] deficient in addressing your concerns?
DC2.6.20	Suffolk County Council	In your Deadline 4 submission [REP4-043], you suggested that a Requirement in the East Anglia THREE Offshore Wind Farm Order 2017 offered an appropriate general approach to a lighting Requirement for this dDCO [REP5-005] and that inclusion of a good practice measure is also needed in CEMP Appendix A, CoCP [REP3-026]. Can you clarify: 1. Albeit that the basis for your suggested Requirement is reproduced from a made DCO, why is it considered appropriate in this instance? 2. Are you only suggesting the additional provisions in respect of Work No. 9, Grid Supply Point Substation to the east of Wickham St Paul, as set out in Schedule 1 of the dDCO [REP5-005]? 3. Aside from your ongoing concerns about the draft nature of management plans subject of Requirement 4, in what way do you consider section 6.4 of the CEMP [REP3-024] deficient in addressing your concerns?
DC2.6.21	The Applicant	In your Comments on Other Submissions Received at Deadline 4 [REP5-025], you responded to the councils' suggestions that an additional Requirement is needed in respect of lighting. However, having been referred to the East Anglia THREE Offshore Wind Farm Order 2017 as precedent for their suggested course of action, why do you consider that the matter is best dealt with in the CEMP rather than by a stand-alone Requirement?



Reference	Question to:	Question
DC2.6.22	Essex County Council Braintree District Council Suffolk County Council	In respect of the suggested scheme to introduce a time limit on HGV movements on the local road network during the construction phase of the proposed development, can you advise on the following questions arising: 1. Who would enforce the scheme? 2. What provision would an associated Requirement need to make for a reporting mechanism if the control was considered to have been breached? 3. How do you respond to the Applicant's submission in its Comments on Other Submissions Received at Deadline 4 ([REP5-030] page 11) where it says that: ' <i>An unintended consequence of a requirement to restrict HGV movements may mean that vehicles need to park and wait for "core hours". This in itself could lead to adverse impacts</i> '?
DC2.6.23	BNP Paribas Real Estate on behalf of Royal Mail	The Applicant's comments on Written Representations ([REP3-048] pages 36 and 37) referred to wording to be included in the CTMP [REP3-030] that would purportedly address your practical concerns about road closures, diversions etc. Such arrangements would be secured by Requirement 4 of the dDCO [REP5-005]. Is this control mechanism adequate? If you consider it inadequate, can you explain why?
DC2.6.24	BNP Paribas Real Estate on behalf of Royal Mail	How do you respond to the Applicant's Comments on Response to First Written Questions ([REP4-029] pages 59 and 60) where it addresses your reply to ExQ1 CA1.4.29?
DC2.6.25	BNP Paribas Real Estate on behalf of Royal Mail	Further to your response to ExQ1 [REP3-076], where you express generic concerns about the accuracy of Transport Assessments, do you perceive any specific deficiencies in the Applicant's Transport Assessment [APP-061] in terms of baseline transport conditions, methodology or outcome?
<b>7. Good design – no questions in ExQ2</b>		
<b>8. Historic environment</b>		
HE2.8.1	Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	Concerns have been expressed about archaeological trial trenching and the Applicant's outline Written Scheme of Investigation during the Examination so far. At Deadline 5 [REP5-016], the Applicant confirmed that field surveys were completed in November 2023 and submitted an updated outline Written Scheme of Investigation to reflect completed trial trenching results and feedback received from you at Deadlines 3 and 4. Are you now content with this matter? If not, please summarise what remains outstanding.  The intention signalled in Suffolk County Council's Deadline 6 submission, Response to the Applicant's Comments on any other submissions received at Deadline 4 ( <i>sic</i> ) [Examination Library reference pending], to submit a joint response with Essex County Council to raise outstanding issues with the OWSI is noted, and the relevant part of that document can be cross-referenced in response to this question insofar as it is relevant and comprehensive, if submitted.

Reference	Question to:	Question
HE2.8.2	The Applicant	At Deadline 5 [REP5-016], you confirmed that archaeological field surveys were completed in November 2023. Whilst you submitted an updated outline Written Scheme of Investigation to reflect the results, the field reports and relevant data associated with areas that were omitted at application were not submitted. Can you clarify when the additional trial trenching and other results will be submitted into the Examination and explain any arrangements that you have put in place to allow the local planning authorities an early sight of them?
HE2.8.3	Babergh and Mid Suffolk District Councils Suffolk County Council	You have previously raised concerns that archaeological mitigation requirements are not appropriately represented within the Applicant's REAC. The REAC ([REP4-018] and [Deadline 6 version yet to be allocated an Examination Library reference]) has since been amended and now includes additional measures relating to the Written Scheme of Investigation. Has this addressed your concerns in relation to this?
HE2.8.4	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council	A number of submissions have been made and oral evidence presented in relation to the Applicant's assessment of the effects of the Proposed Development on the historical cultural associations of the landscape and associated buildings in the Dedham Vale, Stour Valley and Brett Valley with famous artists and writers. These include a helpful compendium of paintings linked with Benton End from Babergh and Mid Suffolk District Councils [REP5-030]. The Applicant has also submitted a Technical Note on Cultural Associations [REP5-028], which focuses on Benton End House and Overbury Hall and summarises how cultural associations were considered in the landscape and historical assessments.  Are you content that this Technical Note adequately addresses any perceived shortcomings of the assessment? Do you consider that the body of information and assessment in front of the Examination addresses the requirements of the NPS adequately, and in particular can you comment on whether it identifies the contribution to the significance of the assets that the NPS requires?  Do you consider that the cultural associations, if more fully addressed, could add sufficient additional sensitivity to the identified built heritage receptors and their settings to change the assessment outcome to being significant (in terms of the Applicant's stated approach to the EIA), or to increase the degree of harm that would result from the Proposed Development on those listed buildings?
HE2.8.5	Babergh and Mid Suffolk District Councils	Further to your concerns about listed buildings in the vicinity of the route of the Proposed Development outside and to the west of Hintlesham woods and your subsequent confirmation of the assets involved [REP4-039], the Applicant has confirmed that all three buildings [REP5-025] are assessed in Appendix 8.2 of the ES, Historic Environment Impact Assessment [APP-127]. Are you now content with this matter? If not, please clarify your concerns.
HE2.8.6	Essex County Council Braintree District Council	At Deadline 5 ([REP5-025], page 125), the Applicant responded to your concerns about the assessment of the Proposed Development on several listed buildings that you had identified (Gentry's Farm, Nether House Farm, Netherby Cottage, Moorcote and Ansell's, Abbot's Farm, All Saints Church). Are you now content with this matter? If not, what remains outstanding?

Reference	Question to:	Question
HE2.8.7	Suffolk County Council	At Deadline 4 [REP4-039], you highlighted some additional sites in the Suffolk County Historic Environment Record. The Applicant responded at Deadline 5 [REP5-025]. Are you now content with this matter? If not, what remains outstanding?
HE2.8.8	The Applicant Historic England	The signed SoCG between the Applicant and Historic England submitted at Deadline 5 confirmed that all matters are agreed, apart from the detail and wording of the proposed embedded measure EM-AB01 relating to pylon positioning restrictions to the north of Hintlesham Hall, which was noted as being still under discussion. There appeared to be no update at Deadline 6. When are the two parties' final positions on this matter likely to be submitted into the Examination?
HE2.8.9	The Applicant Historic England Suffolk Preservation Society Babergh and Mid Suffolk District Councils Suffolk County Council	In relation to the potential impacts of the Proposed Development on Hintlesham Hall (including the associated listed buildings, and the overall setting) could you outline your understanding of the applicable legal and policy framework in respect of 'avoidable harm'? If it was to be assumed for the purposes of this question that there was agreement that the pylons and the overhead line could be located anywhere within the proposed Limits of Deviation without causing substantial harm to the listed buildings at Hintlesham Hall, to what extent would it be important in legal and policy terms that the degree of harm was nevertheless kept to the minimum possible level, so as not to cause 'avoidable harm'?
<b>9. Landscape and views, including trees and hedgerows</b>		
National Landscape and landscape assessment		
LV2.9.1	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	The Levelling-up and Regeneration Act 2023 (sections 245 (5) and (6)(a)) will amend the Countryside and Rights of Way Act 2000 in respect of the 'general duty' imposed on public bodies dealing with functions in an Area of Outstanding Natural Beauty (AONB). In addition, on 22 November 2023 (and as part of a national change), the Dedham Vale AONB was renamed the Dedham Vale National Landscape. Do you consider these changes to have any effect on the Proposed Development and the impact assessments that have been submitted? If so, describe them, and, if not, explain why not.

Reference	Question to:	Question
	Dedham Vale National Landscape and Stour Valley Partnership	
LV2.9.2	The Applicant Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	Without prejudice to your view on the adequacy of landscape mitigation and compensation provided as part of the Proposed Development, how might any proposal for additional compensation (for example, a landscape restoration fund and managing officer) be secured, and would it pass the relevant tests for a legal agreement? Are you able to provide examples of comparable projects where compensation has been provided in this way?
Visual assessment		
LV2.9.3	Suffolk County Council	Your answers to ExQ1 [REP3-078] expanded on the concerns in your LIR [REP1-045] in relation to the effectiveness of the proposed mitigation planting for the Stour Valley west cable sealing end compound. The Applicant [REP3-052] has explained the rationale behind the design of the proposed planting whilst acknowledging that some views would remain open at year 15 due to the location of the underground cables (for example, from viewpoint G-07). The Applicant has further explained that this was balanced against the benefits of removing pylons from the view and resulted in an adverse medium-small magnitude of change overall. Do you now accept this explanation and assessment, or do you wish to put forward a more effective scheme of mitigation that does not impinge on the identified technical constraints?
LV2.9.4	The Applicant	In its Issue Specific Hearing 4 notes [REP4-039], Suffolk County Council makes a specific suggestion that the existing roadside hedges along the north-eastern side of the lane between Pebmarsh Road and Mabb's Corner could be strengthened and managed in such a way that they would provide additional visual mitigation for the Stour Valley west cable sealing end compound. Your response to other Deadline 4 submissions [REP5-025] defers to 'item 5 of Table 4.1'. Can you confirm that this is the entry on page 129? If so, your answer does not appear to respond to this specific suggestion being put forward by Suffolk County Council. Can you clarify and respond?
LV2.9.5	The Applicant	Further to your response to ExQ1 LV1.9.31 in relation to the comparative ZTV ([APP-146], figure 6.7), you have confirmed that a height 2.5m below the top height of the proposed new 400kV pylons was used to generate the ZTV 'to focus the assessment'. Can you confirm whether the full height of the existing 132kV pylons was used to generate their

Reference	Question to:	Question
		ZTV, or if it was based on top height minus 2.5m? If the latter, please signpost where this is evidenced in the assessment.
LV2.9.6	The Applicant	Further to your response to ExQ1 LV1.9.34 [REP3-052] and the Vegetation Retention and Removal Plan [APP-183], can further clarification be provided? ExQ1 LV1.9.34 was intended to refer to the impact of the Proposed Development on the removal of vegetation, how this impact might vary depending on where within the flexibility of the Order Limits the Proposed Development was ultimately constructed, and whether a worst-case assessment was carried out in this respect. It is unclear from your response why 'the Final Alignment' might require 'changes to the LEMP (document 7.8(B)) and its Appendices'. The relevance of the second part of your answer is also unclear. The question was intended to cover the range of visual, landscape, ecological and any other environmental effects that might result from both the overhead and undergrounded sections of the proposed new line, depending on where the Proposed Development was ultimately constructed, rather than a simple reference to pylon height. Could there, for example, be locations where the indicative proposed alignment shown on the general arrangement plan cuts through the centre of a woodland feature, whilst the final alignment may be through the edge of that feature, with different visual, landscape and ecological effects? Or as another example, where the proposed alignment avoids an important hedgerow, but the final alignment could be through that feature? If so, please signpost where in the ES this is detailed.
<b>Hedgerows and trees</b>		
LV2.9.7	Woodland Trust	At Deadline 5, the Applicant [REP5-025] suggested a new mitigation commitment in relation to veteran tree T378 (EM-G13), and this has been added to the REAC at Deadline 6 [Examination Library reference to be confirmed]. Does this satisfy your concerns in relation to this veteran tree?
<b>10. Land use and soil</b>		
<b>Agriculture and other land use</b>		
LU2.10.1	The Applicant	Further to your response to ExQ1 LU1.10.2 [REP3-052], can you summarise (or signpost to the relevant sections in the ES) any temporary effects on the operational effectiveness of individual land holdings?
LU2.10.2	The Applicant	Your response to ExQ1 LU1.10.3 [REP3-052] noted that your assessment assumed that any land provisionally classified as Grade 3 would comprise BMV land. Of the 644ha of land within the Order Limits, can you confirm the total amount (in ha) of BMV land that would be temporarily and permanently affected (including whether the total includes pylon footprints)?
LU2.10.3	The Applicant	Further to your response to ExQ1 LU1.10.2 and ExQ1 LU1.10.12 [REP3-052], of the 644ha of land within the Order Limits, can you calculate the area (ha) and percentage of agricultural land temporarily and permanently affected by the Proposed Development? Can you further calculate the area (ha) and percentage of affected land in agri-environmental, forestry and woodland grant schemes?

Reference	Question to:	Question
LU2.10.4	The Applicant	Further to your response to ExQ1 CM1.5.53 [REP3-052], would it be useful to update the Materials and Waste Management Plan [APP-181] to include reference to any related matters such as the Contractor's Sustainability Action Plan?
LU2.10.5	The Applicant	Paragraph 9.3.1 of the LEMP [REP3-034] refers to grassland being handed back to the landowner once the grass sward has re-established. Can you clarify how 're-established' will be determined, and confirm the period of aftercare (between end of construction and re-established), and how this aftercare period is secured in the dDCO?
LU2.10.6	The Applicant	Can you summarise how land quality influenced the location of the Proposed Development during route selection and the identification of locations for structures, and how the selected route limits the impact on BMV land?
<b>Soils, geology and ground conditions</b>		
LU2.10.7	The Applicant	Further to your response to ExQ1 LU1.10.22 [REP3-052], can you clarify if the EIA worst-case scenario is based on an area of topsoil being stripped that amounts to 644ha. If not, can you confirm the total area (ha) of topsoil strip.
LU2.10.8	The Applicant	Further to your response to Action Point 5 in Issue Specific Hearing 1 [REP1-034] and your response to ExQ1 LU1.10.23 [REP3-052], can you summarise the control measures that are proposed to plan, manage and monitor excavated subsoil material within the Order Limits effectively?
LU2.10.9	Babergh and Mid Suffolk District Councils Suffolk County Council Essex County Council Braintree District Council	Do you have any outstanding comments on the level of detail currently in the CEMP (as secured through dDCO Requirement 4) for soil management?
LU2.10.10	The Applicant	Further to your response to ExQ1 MG1.0.2 [REP3-052], can you confirm the period of soil and land aftercare (between end of construction and handover), and how this aftercare period is secured in the dDCO?
<b>11. Noise and vibration</b>		
NV2.11.1	The Applicant	Further to your response to ExQ1 NV1.11.7 [REP3-052], the mitigation example that you provided relates to the use of pad foundation or press-in piles, reduced energy per blow and pre-boring for piled foundations. Can you clarify if different piling options and techniques have been identified and assessed in the ES and, if not, why not?

Reference	Question to:	Question
NV2.11.2	The Applicant	Further to your response to ExQ1 NV1.11.9 [REP3-052], can you confirm if the main works contractor best practicable means to reduce noise and vibration (in accordance with the requirements of the CEMP) includes any measures by organisations promoting horse care and welfare such as the British Horse Society?
NV2.11.3	Babergh and Mid Suffolk District Councils Braintree District Council	Further to the Applicant's response to ExQ1 NV1.11.8 [REP3-052] that the CEMP would control noise and vibration and provide the same function as a standalone Noise and Vibration Management Plan, can you comment on the adequacy of the level of detail currently in the CEMP (secured through DCO draft Requirement 4). If the level of detail is insufficient, can you summarise what measures are required to manage, monitor and control noise and vibration levels across the Order Limits?
NV2.11.4	The Applicant	Can you clarify if the contractor's detailed construction noise and vibration assessment would be undertaken by a noise and vibration specialist? (Paragraph 14.3.5 of the CEMP [REP3-024] refers.)
NV2.11.5	The Applicant	Can you clarify your Control of Pollution Act 1974 section 61 approach to construction hours (draft Requirement 7(3)) for operations that may take place outside core working hours? For example, where severe weather conditions disrupt or interrupt normal construction activities, would you seek to engage with the relevant planning authority at least six weeks prior to submission of the Section 61 application to agree the format for the submission. If not, how would you approach the scenarios listed in Requirement 7(3)?
NV2.11.6	The Applicant	The DMRB LA 111, Noise and Vibration refers to lowest observable adverse effect level (LOAEL) being established and reported in the ES for all noise sensitive receptors (NSR) within the construction activity study area, with reference to baseline noise level. Can you confirm the LOAEL baseline noise levels for NSRs during the core working hours period, start up and close down activities up to 1 hour either side of the core working hours, and night-time period?
NV2.11.7	The Applicant	Table 3.1 of ES Appendix 14.2 Construction Traffic Noise and Vibration Assessment [APP-137] presents the findings of the noise assessment of construction traffic and considers the closest NSR to the respective temporary access routes as a worst case. Can you clarify if the assessment considered the impact of construction activities such as a dump truck reversing and tipping material near NSRs? If not, how would such activities be controlled through any DCO?
NV2.11.8	The Applicant	Further to your response to ExQ1 NV1.11.11 [REP3-052], can you comment on the recognition in BS 52281-1 (and its relevance to the Proposed Development) that impulsive noise levels cannot always be controlled effectively using steady noise levels ( $L_{Aeq,T}$ over a period of several hours or for a working day) and that a higher, short-term limit can be useful?
NV2.11.9	The Applicant	Can you describe the impact from individual noise events (with reference to $L_{Amax}$ ) and the relationship of maximum level of individual noise events and impacts on sleep?
NV2.11.10	The Applicant	Where individual events of impulsive noise or vibration levels have the potential to exceed No Observable Effect Level (NOEL) at NSRs, can you describe your approach to control and monitor these individual events?

Reference	Question to:	Question
NV2.11.11	The Applicant	Paragraph 5.12.6 of the November 2023 Overarching National Policy Statement for Energy (NPS EN-1) refers to applicant assessment and the prediction of how the noise environment will change with a proposed development in the shorter term, such as during the construction period. Can you describe the short-term changes in the noise environment due to construction noise with distinctive characteristics on noise-sensitive receptors (and noise-sensitive areas) and describe the impact of construction noise with distinctive characteristics on health and well-being?
NV2.11.12	The Applicant	Further to your response to ExQ1 LU1.10.24 [REP3-052] that the Limits of Deviation allow for piling or drilling into rock, can you clarify (with reference to relevant document and paragraph) if the impact of drilling or pecking into rock as a result of excavation works (and not related to piling) has been assessed in the ES?
NV2.11.13	The Applicant	Further to your response to ExQ1 CM1.5.11 [REP3-052], can you clarify if the worst-case assessment of noise from vehicles associated with the construction of temporary access routes includes the delivery and dumping of aggregates by 20 tonne tipper lorries, followed by lifting of the aggregates by an excavator and dumping into a 9-tonne dumper? If not, why not?
NV2.11.14	The Applicant	Paragraph 4.2.1 of the Construction Traffic Noise and Vibration Assessment [APP-137] predicts that vibration levels from construction road traffic would not be significant. However, this is based on an assumption that roads are free from defects and traffic speeds are low. What measures would you take to ensure that construction traffic on roads is limited to low speeds, and that roads would be free from defects?
NV2.11.15	The Applicant	Paragraph 14.3.8 of the Noise and Vibration chapter of the ES [APP-082] states that the underground cables and the cable sealing end compounds would not generate noise. Can you clarify if this means that these features would emit no noise, i.e., 0 dB(A)?
NV2.11.16	The Applicant	Can you explain how the noise thresholds (Category A) in Section E.3.2 of BS 5228-1 translate to represent the Significant Observed Adverse Effect Levels (SOAEL) for daytime, evenings and weekends, and night-time?
NV2.11.17	The Applicant	Can you explain why the construction noise SOAEL threshold level of 65 dB $L_{Aeq,T}$ is from 0700 for Saturdays (paragraph 14.4.16 in the Noise and Vibration chapter of the ES [APP-082]) whilst construction working hours for Saturday start from 0800 in the dDCO (Requirement 7) and paragraph 14.4.33 of the ES [APP-082]?
NV2.11.18	The Applicant	Can you explain with evidence how a daytime construction noise level of 50 dB $L_{Aeq,10h}$ translates to LOAEL?
NV2.11.19	The Applicant	Can you confirm the LOAEL for construction noise at night-time?
NV2.11.20	The Applicant	Can you clarify if the assessment considered the effects of construction noise (above NOEL to LOAEL, and above LOAEL) on health and well-being?
NV2.11.21	The Applicant	Paragraph 2.9.12 of the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) outlines a range of mitigation measures that must be considered. Can you summarise how ES Appendix 14.3 Overhead Line Noise Assessment [APP-138] takes into account:



Reference	Question to:	Question
		<ul style="list-style-type: none"> <li>i) the positioning of lines to help mitigate noise;</li> <li>ii) appropriately sized conductor arrangement used to minimise potential noise;</li> <li>iii) quality assurance through manufacturing and transportation;</li> <li>iv) cleanliness of conductors during stringing and installation.</li> </ul>
NV2.11.22	The Applicant	Paragraph 2.9.13 of the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) states the ES should include information on planned maintenance arrangements. Can you signpost the relevant sections in the ES?
NV2.11.23	The Applicant	Paragraph 14.4.11 of ES Chapter 14 Noise and Vibration [APP-082] refers to ambient noise levels being relatively low, as corroborated by Defra strategic noise mapping, as well as noise surveys previously conducted in the area. Can you signpost to the reference documents (submitted into the Examination) to demonstrate that baseline ambient noise levels and background noise levels are relatively low for the study area.
NV2.11.24	The Applicant Babergh and Mid Suffolk District Councils Braintree District Council	<p>At Deadline 6, the Applicant submitted its Document 8.8.7, Technical Note for Noise Sensitive Receptors [Examination Library number to be confirmed]. This presents the findings of a further assessment (using a lower noise threshold) of potential construction noise impacts on NSRs during weekends and bank holiday periods. It identifies four additional locations where construction noise levels may be in excess of the lower threshold for weekend working at six NSRs. It is understood that the Applicant provided this in advance to the local authorities for comment, including a request for identification of any additional NSRs of concern.</p> <ol style="list-style-type: none"> <li>1. Could the Applicant please confirm the range of noise sources that were included in the assessment (for example, did it include construction traffic movements), and the extent to which it addresses intra-project cumulative noise effects?</li> <li>2. Can you update your position on this matter in response to this question and if it is not your final position, indicate when you consider that will be reached and how it will be submitted into the Examination.</li> <li>3. Are you content that the types of noise mitigation measures that have already been identified for the NSRs identified in the ES could, in principle, be applied to the newly identified NSRs such that any adverse noise effects could be satisfactorily reduced?</li> <li>4. Could the Applicant detail how any necessary additional mitigation measures will be secured?</li> </ol>
<b>12. The water environment</b>		
Flood Risk Assessment		
WE2.12.1	The Applicant	Paragraph 5.7.2 of Overarching National Policy Statement for Energy (NPS EN-1) states, ' <i>It... should not consent development in Flood Zone 3 or Zone C unless it is satisfied that the Sequential and Exception Test requirements have been met</i> '. Paragraph 5.7.16 of NPS EN-1 sets out the three elements of the Exception Test to be passed for the development to be consented. As the application has not excluded the possibility of structures being located within Flood Zone 3, can you provide the information (as described in paragraph 5.7.16 of NPS EN-1) to support the construction of temporary and permanent infrastructure in Flood Zone 3, or signpost where it is located in the application documents?

Reference	Question to:	Question
Surface water management		
WE2.12.2	The Applicant	Can you confirm whether the proposed drainage systems for the Proposed Development comply with any national standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010?
Management measures		
WE2.12.3	The Applicant	<p>The Environment Agency [REP3-070] states in its response to ExQ1 WE1.12.12:</p> <p><i>'The applicant has not mentioned any mitigation measures for interruption to other abstractors (especially from dewatering activities as there are groundwater licences near the river crossings). We are however pleased that the applicant has noted that they will not be interrupting flows. Measure AS04 talks about interrupting water supplies for livestock and measures taken but there is no mention of any other water supplies; this could be because only supplies to livestock are affected but should be clarified with the applicant'.</i></p> <p>Can you provide clarification on whether water supplies, other than supplies for livestock, would be interrupted because of proposed works at river crossings?</p>
WE2.12.4	Natural England	<p>Paragraph 3.1.2 of the Applicant's HRA Report [APP-057] explains the location of the Stour and Orwell Estuaries Special Protection Area and Ramsar sites in relation to the Order Limits, noting that the Rivers Stour, Box and Brett and the Belstead Brook all enter the Stour and Orwell Estuaries, approximately 5.72km south-east of the Order Limits.</p> <p>Notwithstanding the likelihood that the Environment Agency would be the competent authority in this respect, and that you consider that you should be consulted, are you confident that sufficient controls could be put in place to ensure that the proposed construction activities in Flood Zone 3 (including horizontal directional drilling under the River Stour) would not adversely impact the integrity of the European site?</p>
WE2.12.5	The Applicant	<p>In its response to ExQ1 WE1.12.12 [REP3-070], the Environment Agency stated, <i>'General good practice and topic-specific measures in 7.5.1 – GG14, GG15 and W10 should stipulate that any pollution incident (inc. sediment run-off) should immediately be reported to our incident hotline 0800 807060. W13 – movements must be carried out by a suitably registered waste carrier.'</i> Can you confirm whether CEMP Appendix A, CoCP has been updated to reflect the Environment Agency's observations on the general good practice and topic-specific measures GG14, GG15 and W10?</p>
WE2.12.6	The Applicant	<p>In its response to ExQ1 WE1.12.15 (de-watering activities), the Environment Agency [REP3-070] notes that, <i>'These partially satisfy Regulation 5 of the Water Abstraction and Impoundment (Exemptions) Regulations 2017... but should also consider the other requirements.'</i> Has Chapter 4 of the ES [APP-072] been updated to reflect this observation?</p>
WE2.12.7	The Applicant	Can you confirm whether construction activities would potentially raise a need to dewater (to the extent that a permit would be required) anywhere else other than the River Stour and River Box crossings?

Reference	Question to:	Question
<b>Temporary bridges and culverts</b>		
WE2.12.8	Environment Agency	Further to your response to ExQ1 WE1.12.40, can you confirm the status of discussions with the Applicant concerning embankments that potentially need to be installed?
WE2.12.9	The Applicant	Should culverts installed for construction purposes not be removed, can you identify the measures that could be put in place to mitigate or compensate for the likely net loss of wetland habitats?
<b>13. Traffic and transport</b>		
<b>Transport assessment</b>		
TT2.13.1	The Applicant	In fulfilment of the first action point from Issue Specific Hearing 6, can the traffic data that has been shared with the local highway authorities be provided in the following manner? For each of the 167 traffic count sites: 1. Traffic count location, including the road name. 2. The purpose of the count, such as obtaining traffic data at the point of a proposed temporary or permanent access. 3. The speed limit. 4. The duration of the traffic count (in days) and the daily hours of operation. 5. The calculated annual average daily traffic flow or other equivalent statistical measure of traffic flow. 6. Classification of the traffic count by vehicle type. 7. The 85 <sup>th</sup> ile speed.
TT2.13.2	The Applicant	Paragraph 6.2.8 of the Transport Assessment [APP-061] explains that an uplift of 12.5% was applied when converting monthly construction traffic estimates to daily estimates, to allow for some variation in the timing of deliveries and removals from construction sites. What was the basis for selecting 12.5%?
TT2.13.3	The Applicant	Paragraph 4.3.7 of the Transport Assessment [APP-061] explains that personal injury and collision data were analysed for roads where the increase in daily total traffic flow due to the Proposed Development is expected to be 5% or more of future baseline traffic flows. Have you examined the personal injury and collision data for vulnerable road user groups, such as walkers, cyclists and horse riders, on those construction routes where the forecast increase in traffic does not reach 5% or more of future baseline traffic flows? If not, why not?
TT2.13.4	The Applicant	ES Chapter 15, Cumulative Effects Assessment [APP-083], reports on the assessment of intra-project cumulative effects. Can you confirm whether the effects on the public transport network due to temporary traffic management and temporary closure of public rights of way and public highways were considered in this assessment?

Reference	Question to:	Question
TT2.13.5	The Applicant	<p>The Equality Impact Assessment ([REP3-047] page 18) states, '<i>there may be potential for differential impacts on younger and older people, and disabled people due to increased PRoW distances and severance during construction</i>'. Can you expand on the following?</p> <ol style="list-style-type: none"> <li>1. More clearly identify the likelihood of these impacts (i.e., clarify '<i>there may be potential</i>').</li> <li>2. Explain whether the potential differential impacts would be positive or adverse.</li> <li>3. Describe how each of the specified groups might be affected.</li> <li>4. Identify any potential discrimination.</li> <li>5. Describe the impacts in other relevant areas including health and wellbeing.</li> </ol>
TT2.13.6	The Applicant	<p>The Transport Assessment ([APP-061] paragraph 6.2.12) explains that the peak daily and hourly construction vehicle forecasts are presented in the traffic flow diagrams (Figure 7) as two-way directional construction traffic flows. Can you confirm if these data include the forecast construction staff vehicle movements?</p> <p>If so, can you provide traffic flow diagrams to show the forecast crew minibuss movements, based on the vehicle occupancy factors to derive staff vehicle forecasts (paragraph 6.2.9 of the Transport Assessment), on the local road network in the study area during the morning and evening peak hours?</p> <p>If they do not, why not?</p>
<b>Construction traffic and construction route strategy</b>		
TT2.13.7	The Applicant	Can you explain the process that would be followed to authorise the use of project-related signing on the public highway where it is not prescribed in The Traffic Signs Regulations and General Directions 2016?
TT2.13.8	Essex County Council Suffolk County Council	In ExQ1 [PD-005], the ExA raised a query about whether heavy good vehicles associated with the Proposed Development would travel past any schools or other particularly sensitive receptors (TT1.13.31). Are you content with the Applicant's response ([REP3-052] pages 192 and 193)?
TT2.13.9	Essex County Council Suffolk County Council	In ExQ1 [PD-005], the ExA raised a query related to members of the public identifying vehicles associated with the project (TT1.13.32). Are you content with the Applicant's response ([REP3-052] page 193)?
TT2.13.10	The Applicant	How were the daily traffic movements referenced in the Transport Assessment [APP-061] calculated?
TT2.13.11	The Applicant	How was the peak staff requirement referenced in the Transport Assessment [APP-061] calculated?

Reference	Question to:	Question
Public rights of way		
TT2.13.12	Essex County Council Suffolk County Council	Are you content with the sufficiency of the Applicant's response [REP1-034] to action points 16 and 17 from the first Issue Specific Hearing [EV-018], relating to the public rights of way survey data?
TT2.13.13	Essex County Council Suffolk County Council	Are you content with the suitability and sufficiency of the Applicant's Public Rights of Way Management Plan [REP3-056]? If not, why not, and what further content would be required to satisfy your concerns?
TT2.13.14	The Applicant	The DMRB guidance, Volume 11, Section 3, Part 8 Environmental Assessment, was published in 1994 and is relied on in ES Chapter 12 Traffic and Transport [APP-080]. This guidance was withdrawn in 2019 and replaced with DMRB Volume 11, Section 3, LA 112 Sustainability and environment; Appraisal; Population and human health. Why have you placed reliance on the superseded guidance?
TT2.13.15	The Applicant	Table 1.2 of ES Appendix 5.4, Assessment Criteria [APP-096], sets out the criteria used for the traffic and transport assessment in relation to changes in: walker, cyclist and horse rider journey length; severance; and pedestrian amenity, fear and intimidation. When establishing these criteria, can you confirm whether and how consideration was given to: a. The likely time needed by walkers, cyclists and horse riders to travel each proposed diversion route? b. The likelihood that walkers, cyclists and horse riders would be dissuaded from making their usual journeys? c. The safety of walkers, cyclists and horse riders diverted onto the public highway?
TT2.13.16	Essex County Council Suffolk County Council	Section 5.4 of the Public Rights of Way Management Plan [REP3-056] sets out the Applicant's reinstatement approach for public rights of way. Are you content with the scope of the survey work to be carried out to ensure that final reinstatement could return the public rights of way to their original condition on completion of the Proposed Development?