

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.9.3: Applicant's Responses to Second Written Questions

Final Issue A
January 2024

Planning Inspectorate Reference: EN020002

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



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Introduction

Document Purpose

This document provides the Applicant's responses to the Examining Authority's Further Written Questions (ExQ2) [PD-008] received on 22 December 2023 for the Bramford to Twinstead Reinforcement ('the project'). This document contains responses to all of the questions addressed to the Applicant. It also includes certain instances where responses have been provided to questions not addressed to the Applicant, but where the Applicant considers a response would helpfully assist the Examining Authority.

Project Overview

National Grid Electricity Transmission plc (here on referred to as 'the Applicant') has made an application for development consent to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The Bramford to Twinstead Reinforcement would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km (18 miles), the majority of which would follow the general alignment of the existing overhead line network.

The application for development consent was accepted for Examination on the 23 May 2023.

Structure of the Document

This document has been structured to align with the numbering used within the Examining Authority's Further Written Questions ExQ2 [PD-008]. Therefore, this document starts at Chapter '0' (Miscellaneous and General) in terms of the numbering of the chapters and continues through to Chapter 13 (Traffic and Transport). In addition, the following appendices have been included at the end of the document:

- Appendix A: Construction Staff Vehicle Flow Diagram

0. Miscellaneous and General

0.1 General and Cross-Topic

Table 0.1 – General and Cross-Topic

Reference	Question	Applicant's Response
MG2.0.1	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?	<p>Paragraph 15.6.20 in Environmental Statement (ES) Chapter 15: Cumulative Effects Assessment (CEA) [APP-083] covers the health (including the mental health) of local communities and concludes that with the good practice measures outlined within the Construction Environmental Management Plan (CEMP) [REP6-021] and the Code of Construction Practice (CoCP) [REP3-026] that it is not anticipated that there would be effects on the health of local communities as a result of the project.</p> <p>Paragraph 3.5.6 of ES Appendix 15.1: Cumulative Effects Baseline [APP-140] notes that the baseline health summary shows that the trend for the wards within the wider study area is generally significantly better than or not significantly different to the England average, therefore there is no particular vulnerability in this location. The project is located in a rural environment away from areas of large population and it would have no effects on access to or services provided at health care facilities. The construction activities would be temporary and short term, particularly in any specific location, and the effects would be reduced to a non-significant level through the measures contained within the CEMP [REP6-021] and the CoCP [REP3-026]. Therefore, it is not anticipated that there would be significant effects on the health (including mental health) of local communities.</p> <p>The Applicant also provided a response in relation to mental health in Table 2.28 of the Applicant's Comments on Relevant Representations [REP1-025].</p>

0.2 Legislation and Policy

Table 0.2 – Legislation and Policy

Reference	Question	Applicant's Response
MG2.0.2	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	As the March 2023 draft replacement NPS have been superseded by the November 2023 proposed revised NPS, the Applicant does not consider it to be useful to provide a full assessment of the changes between the two versions. Instead, the Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6, which

Reference	Question	Applicant's Response
	<p>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?</p>	<p>includes a full assessment of the project against the proposed revised NPSs (November 2023) in the Accordance Tables contained at Appendix F (EN-1) and Appendix G (EN-5) of the Planning Statement [REP6-011].</p> <p>However, the main change to highlight is that electricity transmission infrastructure is now considered to be a development of 'critical national priority', a category limited to offshore wind developments in the March 2023 draft. This changes how residual impacts are considered in the planning balance for electricity transmission infrastructure. As stated in paragraph 4.2.15 of NPS EN-1 '<i>Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.</i>' The weight that can be applied to the proposed revised NPSs as important and relevant matters has also been increased because they are considered likely to be the final versions designated in early 2024.</p> <p>Nevertheless, the 2011 versions of the NPS remain in force until the proposed revised NPSs are designated, which is expected to occur in early 2024. Due to the transitional provisions, the application will still be determined in accordance with the extant 2011 NPS suite, however the November 2023 updates are important and relevant considerations in the decision-making process.</p>
MG2.0.3	<p>The Government published an updated National Planning Policy Framework (NPPF) 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?</p>	<p>The Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6, where it is noted at paragraph 7.4.2 that the NPPF was updated on 5 September 2023, with the final version replacing the previous NPPF on 19 December 2023. The December 2023 updates are largely limited to planning for housing, prioritising the use of brown field land, Green Belts and plan making and therefore, have limited relevance to the project. Therefore, the Applicant does not consider the changes to have any potential effects on the application for development consent.</p> <p>Notably, the NPPF (December 2023) does not amend the weight of the NPPF relating to NSIP which is clarified in paragraph 5 of the NPPF and states: '<i>The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.</i>'</p>
MG2.0.4	<p>Can you advise if and how your assessment of the Proposed Development considered the Kunming-Montreal Global Biodiversity Framework?</p>	<p>The Kunming-Montreal Global Biodiversity Framework sets out a vision where '<i>by 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering essential benefits for all people</i>'. The framework is relatively high level and the Applicant considers that the project is compliant with the framework insofar as it is relevant. The decision on the Development Consent Order (DCO) application will be taken in the context of section 104 of the Planning Act 2008 and the policy framework within NPSs EN1 and EN-5. Whilst the project complies with the Kunming-Montreal Global Biodiversity Framework topics where relevant, the framework clearly has less weight in the decision making than the NPSs.</p>

Reference	Question	Applicant's Response
MG2.0.6	Can you advise on the implications of the Leavenheath Neighbourhood Plan (made in July 2023) for the EIA?	<p>The framework has 23 action-oriented global targets for urgent action over the decade to 2030 with the following three themes: reducing threats to biodiversity; meeting people's needs through sustainable use and benefit-sharing; and tools and solutions for implementation and mainstreaming. Where relevant to the project, all these topics are covered in the ES, in particular ES Chapter 7: Biodiversity [REP6-009]. The Applicant has also used the Defra Metric to quantify the habitats affected and as part of demonstrating how it would deliver 10% biodiversity net gain on the project. Further details can be found in the Environmental Gain Report [APP-176].</p> <p>The Applicant has considered the adoption of the Leavenheath Neighbourhood Plan and does not consider there to be any implications on the assessment presented in the ES.</p> <p>The Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6 where it was noted at paragraph 4.10.2 that a small section of the Order Limits in Section F falls within the Leavenheath Neighbourhood Plan Area, designated as of July 2023. The relevant policies are detailed and assessed in Appendix D of the Planning Statement [REP6-011] and include (where relevant to the project):</p> <ul style="list-style-type: none"> ● Policy LEAV4: Surface Water Drainage Issue Locations: <ul style="list-style-type: none"> — Location 3: Road outside Harrow Lodge driveway; and — Location 6: High Road outside Gedding Hall. ● Policy LEAV2 includes provisions for development on designated Local Green Space: <ul style="list-style-type: none"> — Policy LEAV2: Local Green Space: Land to north of entrance to Stoke Road junction with A134 (adjacent to the Order Limits). None of this Local Green Space designation is within the Order Limits and as such, this policy is not engaged; — Policy LEAV2: Local Green Space: Western part of Leadenhall Wood. Both areas are shown on Figure 15 of the Neighbourhood Plan (adjacent to the Order Limits). None of this Local Green Space designation is within the Order Limits and as such, this policy is not engaged. ● Policy LEAV3 makes provision for development proposals within the Area of Local Landscape Sensitivity, which is the area of Leavenheath that is contained within the adopted Babergh Local Plan 2006 as a Special Landscape Area (SLA). This is within the Stour Valley Special Landscape Area. ES Appendix 6.2: Assessment of Effects on Designated Landscapes [APP-098] present the assessment of effects on the Stour Valley SLA. Section 3.6.25 of this appendix concludes that removal of the existing 132kV overhead line and presence of the new 400kV overhead line across the central and eastern part of the SLA would continue to increase the influence of high voltage electricity infrastructure within the SLA, affecting the character of views and overall scenic quality but this would be in the context of the existing overhead lines and telecommunication towers already within the baseline. However, the western part of the SLA will benefit from the removal of the existing 132kV overhead line from the baseline and undergrounding of the proposed 400kV leaving one less overhead

Reference Question**Applicant's Response**

line in the landscape. As stated in paragraph 3.6.27 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [APP-098], by Year 15 the beneficial effects of removing the existing 132kV overhead line in association with the underground cables and trenchless crossings would be moderate beneficial (significant) locally within approximately 1km of the LoD and minor beneficial (not significant) for the SLA as a whole.

The following policies of the Leavenheath Neighbourhood Plan were not specifically referred to in the Planning Statement [REP6-011]:

- Policy LEAV1: Views of Community Importance refers to the view from Kingsland Lane looking southeast towards Honey Tye and the view from the junction of A134, looking west along High Road. Neither of these views would be affected by the project.
- Policy LEAV1 also refers to the scenic beauty and views into and out of the Dedham Vale AONB which covers the south-eastern part of Leavenheath Neighbourhood Plan Area. ES Chapter 6: Landscape and Visual [APP-074] and supporting document ES Appendix 6.2: Assessment of Effects on Designated Landscapes [APP-098] present the assessment of effects on the AONB. These assessments conclude that there would be a long term significant beneficial effect to the AONB during operation from the dismantling and removal of the existing 132kV overhead line and the proposed undergrounding of the proposed 400kV overhead line. This would result in one fewer overhead line within the AONB compared to the baseline.

Section 2.19 of ES Appendix 6.5: Assessment of Effects on Communities [APP-108] presents the assessment of effects on the Leavenheath community area. Table 2.3 of section 2.3 [APP-108] summarises the assessment of effects on the representative viewpoints which are presented at ES Appendix 6.4: Viewpoint Assessment Section F Part 5 [APP-105]. The assessment concluded that overall, the likely effect on visual amenity would be moderate adverse (significant) at Year 1, reducing to minor adverse (not significant) by Year 15 as the reinstatement planting associated with the 400kV underground cables would be maturing and the landscape would be returning to its existing character. Similarly, the embedded planting around the Dedham Vale West CSE compound would both screen and visually integrate it into the wider landscape.

Therefore, the Applicant considers that there are no implications of the Leavenheath Neighbourhood Plan in relation to the assessment presented in the ES.

In addition, whilst it is not mentioned in the Examining Authority's written question, the Applicant notes that since the submission of the application for development consent in April 2023, the Sproughton Neighbourhood Plan was also made on 28 November 2023. The Order Limits for the project only adjoins the boundary of the Sproughton Neighbourhood Plan area where it is proposed to remove a section of the 132kV overhead line. As such, it is not considered that any of the policies of the Sproughton Neighbourhood Plan are capable of being important and relevant to the project as construction effects would be temporary and the 132kV overhead line will have been removed during the operational phase.

Reference Question	Applicant's Response
MG2.0.7	<p>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.</p>
	<p>In respect to the policies mentioned, the Applicant can confirm the project complies with these for the following reasons:</p> <ul style="list-style-type: none"> ● ASSN9: Dark Skies <ul style="list-style-type: none"> — Policy ASSN9 of the Assington Neighbourhood Plan seeks to ensure that new developments do not have a detrimental impact on the character and appearance of an area by adding to light pollution. — During operation there would be no permanent external lighting in the Assington Neighbourhood Plan Area, preserving the dark sky area. This policy was originally omitted from assessment in the Planning Statement [REP6-011] on the basis there would be no permanent external lighting in the Assington Neighbourhood Plan Area. — The method and approach to lighting during construction is set out in the CEMP [REP6-021]. During construction, a standard lighting approach would be implemented. This approach would use mobile lighting towers, orientated away from any adjacent receptors. Solar lighting towers will be considered at the detailed design stage. Lighting shall be the lowest average lux levels necessary for safe delivery of each task.. The use of lighting towers would be limited to the working hours authorised under Requirement 8 of the draft DCO [REP6-003] or where exclusions to these working hours apply. The nearest construction compounds would not be lit at night outside of the working hours authorised under Requirement 8 of the draft DCO [REP6-003] except for welfare and site security cabins that would include low level lighting. Thus the project seeks to ensure that, <i>'any future outdoor lighting systems should have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife subject to highway safety, the needs of particular individuals or groups, and security'</i>, in accordance with Policy ASSN9. ● ASSN13: Assington Special Character Area <ul style="list-style-type: none"> — Policy ASSN13 of the Assington Neighbourhood Plan defines a special character area, unique to Assington. This was originally omitted from assessment in the Planning Statement as the Order Limits are outside of the designated area. — The southern edge of the Assington Special Character Area lies approximately 1km from the nearest point of the proposed new 400kV overhead line. Section 2.3 of ES Appendix 6.5: Assessment of Effects on Communities [APP-108] presents the assessment of effects on Assington community area. Table 2.3 [APP-108] summarises the assessment of effects on the representative viewpoints which were used to inform the assessment, and which are presented at ES Appendix 6.4: Viewpoint Assessment Section F Part 5 [APP-105].

Reference Question	Applicant's Response
MG2.0.8	<p data-bbox="271 1347 745 1437">What weight do you consider should be given in this Examination to the Department for Energy Security and Net</p> <p data-bbox="792 1347 2119 1437">The Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6, which refers at paragraph 6.5.1 to the Transmission Acceleration Action Plan (Department for Energy Security and Net Zero (DESNZ), 2023). This Action Plan is the Government's response to the report from Electricity Networks Commissioner Nick</p>

- Viewpoints F2.14 – View from Public Right of Way (PRoW) south of Assington Hall and F-06 – View from PRoW on the eastern edge of Assington represent the likely change to views out from the Assington Special Character Area. The assessment of effects at these viewpoints conclude that the larger 400kV pylons would be more noticeable and be more likely to break the skyline than the smaller existing 132kV pylons to be removed. Their presence would not, however, fundamentally alter the composition or character of the views currently experienced or the character of the landscape within the Assington Special Character Area. Substantial localised screening would be afforded by the rolling landform and high woodland and tree cover between the village and the new 400kV overhead line. The assessments for these viewpoints conclude that the magnitude of adverse visual change would be small.
- ASSN14: Design Considerations
 - Policy ASSN14 of the Assington Neighbourhood Plan seeks to ensure new development reflects the local characteristics in the Neighbourhood Plan area and create and contribute to a high-quality, safe and sustainable environment. It requires planning applications, as appropriate to the proposal, to demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix B of the Plan. This policy was originally omitted from the Planning Statement. Due to the nature of the project; it was considered that this policy was not strictly relevant as it appears to relate to positively influencing the design of buildings, street scenes and their setting. Nevertheless, the project does generally accord with the aspirations of achieving good design.
 - Environmental Statement Appendix 4.1: Good Design [APP-090] presents the different choices made during the design process. This Appendix sets out the design aspects that have been considered during the development of the project and should be read alongside both ES Chapter 3: Alternatives Considered [APP-071], which explains the different options that were considered during the project development, and also ES Chapter 4: Project Description [APP-072], which describes the design submitted within the application. The design considerations have taken place within the context of balancing planning requirements and meeting all of the Applicant's requirements and duties.
 - As such, the Applicant considers that the project accords with the policies of the Assington Neighbourhood Plan which are afforded some weight in the determination of the application for development consent.

Reference	Question	Applicant's Response
	Zero publication Transmission Acceleration Action Plan - Government response to the Electricity Networks Commissioner's report on accelerating electricity transmission network build?	<p>Winsor CBE published in August 2023 (UK's Electricity Networks Commissioner, 2023) (the 'Winsor Report'), which responds to the 43 recommendations of the Winsor Report. The Action Plan sets out a holistic approach looking at every part of the design and delivery of electricity transmission infrastructure and the Government endorses the package of recommendations contained within the Winsor Report in the Action Plan. The Action Plan emphasises that improvements to the transmission network are urgent and critical, as this overhaul seeks '<i>to transform the way that transmission networks are designed and built and prepare the grid for a new era of Net Zero and energy security</i>' (DESNZ, 2023). The project assists in delivering part of this upgrade and is therefore supported by the Action Plan.</p> <p>The Transmission Acceleration Action Plan sets out a number of measures that can address challenges in delivering a significant upgrade to the transmission network at pace. Examples of actions included in the plan include development of a Strategic Spatial Energy Plan to introduce more strategic planning to the location selection for future low carbon projects (and therefore their connections), aims to designate the energy NPSs, mechanisms to speed up the route design process, fast track approvals and direct benefits for residents and communities who host visible grid infrastructure. It is important for the delivery of the transmission system and the project is part of that system. However, whilst the Action Plan is supported and welcomed by National Grid, it is an Action Plan for future changes that would largely not affect the project because, for example, the location of the project is set, few measures are likely to be in place before a decision is made on the application, the route design and selection was completed some time ago and community benefits are agreed for the project outside the DCO process. Further, the Action Plan is a plan for future changes and the measures within the plan could evolve over time, for example if there is a change in Government. The Action Plan does not provide policy or guidance and has not been subject to consultation. These factors all reduce the weight that would be applied to it as a document.</p> <p>Therefore, whilst the Transmission Acceleration Action Plan provides another publication supporting the need for the project and is relevant to the extent that it relates to transmission infrastructure, the Applicant considers that it has limited relevance for a project at this stage and for all the reasons above, limited weight should be applied to it in decision making as an important and relevant matter.</p>
MG2.0.9	What policy weight do you consider should be given in this Examination to the Department for Levelling Up, Housing and Communities' policy paper Getting Great Britain building again: Speeding up infrastructure delivery (November 2023)?	<p>Getting Great Britain building again: Speeding up infrastructure delivery was published by the Department for Levelling Up, Housing and Communities (DLUHC) in November 2023 (DLUHC, 2023). The document presents actions to speed up infrastructure delivery and is relevant to the extent that the project is an urgent infrastructure project. However, similar to the Transmission Acceleration Action Plan, it predominantly sets out measures that will not be put into place until after a decision is made on the DCO application for the project and/ or would affect project stages that have already been undertaken for the Bramford to Twinstead Reinforcement. The document proposes a three month rapid review to explore how to speed up construction delivery, including whether 24/7 working should be applied to more large infrastructure projects. It is possible that measures on this may affect the construction period of the project and the review is interesting in the context of the discussions between the Applicant and Host Authorities on working hours. However, at present this is only a review and there is no certainty on what might emerge from the review or how any measures may be implemented. The document is also</p>

Reference	Question	Applicant's Response
MG2.0.10	<p>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.</p>	<p>a statement of intentions rather than policy or guidance and was not subject to consultation. Therefore, for the same reasons as the above, the document has limited relevance to the project and should be given limited weight as an important and relevant matter.</p> <p>Paragraph 5.10.5 of NPS EN-1 is a generic policy requiring the Applicant to consider existing and proposed land uses near the project and the impact of the project on such existing and proposed uses. Generally, the Order Limits have been designed to avoid built and proposed development and the Order Limits lie predominantly within areas of agricultural land.</p> <p>Whilst the Applicant has not provided a discrete section in the application for development consent which details the project's impact on all the existing and proposed land uses; the Applicant considers this an all-encompassing policy for many of the aspects already covered within the application for development consent. For example:</p> <ul style="list-style-type: none"> ● Designated sites are considered in ES Chapter 7: Biodiversity [REP6-009]; ● Open space, parks and gardens, amenity green space, playgrounds and cemeteries (etc) are considered in Chapter 9 Planning Statement [REP6-011]; ● Proposed development allocations in adopted and emerging local plans are considered in Chapter 8 of the Planning Statement [REP6-011]. There are no allocated housing sites within or adjoining the Order Limits; ● Committed planning applications within or adjoining the Order Limits are considered in Appendix C of the Planning Statement [REP6-011]; ● Allocated minerals and waste sites are considered in Chapter 8 of the Planning Statement [REP6-011]. The Order Limits include parts of Layham Quarry, which benefits from an allocation in the Suffolk Minerals and Waste Local Plan for an extension to the existing sand and gravel operations at Rands Hall Pit in Layham; and ● Agriculture and soil land uses are considered in ES Chapter 11: Agriculture and Soils [APP-079], which identifies that the land within the Order Limits is predominantly agricultural land. <p>As such, a standalone assessment of land uses in addition to those set out above, would cause duplication and confusion in the assessment.</p>

0.3 The Proposed Development

Table 0.3 – The Proposed Development

Reference	Question	Applicant's Response
MG2.0.11	<p>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.</p>	<p>The use of 'proposed' in the Register of Environmental Actions and Commitments (REAC) [REP6-023] measures EM-E05, EM-G04 and EM-G08 and in the legend of the Work Plans [APP-010] is considered appropriate, as the project is subject to an order granting development consent. The use of 'proposed' in relation to the project infrastructure has been used to distinguish proposed 'new' project infrastructure (such as the new 400kV overhead line) from existing infrastructure (such as pylons and the 132KV overhead line).</p> <p>To confirm, embedded measures EM-E05, EM-G04 and EM-G08 in the REAC [REP6-023] commit to trenchless crossings at the River Box, River Stour and south of Ansell's Grove. These measures secure the use of trenchless crossings at the respective locations by way of their inclusion in the REAC [REP6-023], which is secured through Requirement 4 of the draft DCO [REP6-003].</p>
MG2.0.12	<p>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)?</p>	<p>The use of 'proposed' in the legend of the Work Plans [APP-010] is considered appropriate, as the project is subject to an order granting development consent. The use of 'proposed' in relation to the project infrastructure has been used to distinguish proposed 'new' project infrastructure (such as the new 400kV overhead line) from existing infrastructure (such as pylons and the 132KV overhead line).</p> <p>To confirm, the removal of sections of overhead line is committed to and therefore included as embedded measures EM-P02 and EM-G01 in the REAC [REP6-023], which is secured through Requirement 4 of the draft DCO [REP6-003].</p>
MG2.0.13	<p>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?</p>	<p>The Applicant has no further update on the consents, licences and permits in Table 2.1 of the CEMP [REP6-021]. The final protected species and badger licences cannot be applied for until after development consent is granted. The remaining consents and permits listed, such as Flood Risk Activity Permits, Ordinary Watercourse Consents, and Section 61 consents, require the submission of detailed design information with the consent application (that would be prepared by the Main Works Contractor, once appointed). The Applicant does not consider that any of these are likely to represent an impediment to delivering the project.</p> <p>A response is provided to written question EC2.3.4 which provides an update on progress on securing a Letter of No Impediment (LONI) for Dormouse.</p>

0.4 Alternatives

Table 0.4 – Alternatives

Reference	Question	Applicant's Response
MG2.0.14	<p>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?</p>	<p>Due consideration has been given to feasible alternatives and rationale for the project decisions. The project has prepared a full assessment against the proposed revised NPS (November 2023) in the Accordance Tables at Appendix F (EN-1) and Appendix G (EN-5) of the Planning Statement [REP6-011] submitted at Deadline 6. The applicant provides a summary response on Appendix G (EN-5) on paragraphs 2.9.14 and 2.9.15.</p> <p>As part of its options appraisal process, the Applicant considered whether the use of underground cables, rather than overhead lines, was an appropriate approach in the context of national policy and the Applicant's various statutory duties.</p> <p>The Strategic Options Report (June 2011) [APP-162] considered the feasibility of alternative connections such as sub-sea cables. Meanwhile, the Connection Option Report (May 2012) [APP-164] sets out the justification for why certain sections are overhead line or underground cable (including a cost comparison exercise, correct at the time of publication). Further details on the environmental effects of the different options can be found in ES Chapter 3: Alternatives Considered [APP-071].</p> <p>Also refer to ES Chapter 3: Alternatives Considered [APP-071], which includes at Table 3.4 a 'Comparison Between Overhead Line and Underground Cables'.</p> <p>Paragraph 2.9.20 of proposed revised EN-5 also details that the general presumption in favour of overhead lines should be 'reversed' to favour undergrounding in nationally designated landscapes. Undergrounding was, therefore, considered appropriate in Section E: Dedham Vale AONB as it has a national landscape designation. However, this is not a strict policy requirement and is caveated by paragraph 2.9.22 of proposed revised EN-5 which states, <i>'However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits.'</i></p> <p>On the contrary, paragraph 2.9.23 of proposed revised EN-5 also details that undergrounding may also be appropriate even if no part of the proposed development traverses a designated landscape. As such, undergrounding was also considered appropriate in Section G: Stour Valley, because of the particular qualities of the landscape and its cultural associations. Whilst not designated, the Stour Valley has similar picturesque landscape qualities to Dedham Vale AONB and parts of the Stour Valley form part of the setting of Dedham Vale AONB; the extent of which has been informed by ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [APP-099].</p> <p>It is recognised that a fully underground option would avoid operational adverse landscape and visual effects, however, by avoiding the largely moderate adverse effects of an overhead line on a landscape which carries no national designation, and on local views, could only be achieved by the construction impacts of undergrounding</p>

Reference	Question	Applicant's Response
		<p>and at a significant additional cost to consumers. The considerable additional cost of a fully underground option, which would be met by electricity consumers, could not be justified nor would it be economic and efficient (which is a statutory duty placed upon the Applicant).</p> <p>When considering the relative merits of undergrounding, the adopted and emerging policy clearly favours a flexible policy framework using case-by-case evaluation, as per paragraph 2.11.6 of EN-5. The Applicant, has therefore, considered the relative merits of using underground cables on a case-by-case basis, having holistic regard to technical, cost and environmental factors (amongst other considerations).</p> <p>Table 3.14 of ES Chapter 3: Alternatives Considered [APP-071] provides a summary of the benefits and disbenefits of Trenchless Techniques. Section 3.10 of the same document provides the rationale as to what alternatives have been taken forward or discounted, which summarises the decision-making outcome.</p>

0.5 Socio-Economics and Other Community Matters: Employment

Table 0.5 – Socio-Economics and Other Community Matters: Employment

Reference	Question	Applicant's Response
MG2.0.15	<p>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.</p> <p>Can you comment on this request for a workforce assessment and provide an evidence-based approach to sourcing local labour?</p>	<p>The scoping assessment concluded that the project was unlikely to have significant socio-economics effects and it was therefore scoped out in the Scoping Report [APP-156] from being required as a standalone topic in the ES. The Planning Inspectorate broadly agreed with this position in the Scoping Opinion [APP-159].</p> <p>The Applicant did however update the baseline assessment that was presented within the Scoping Report and submitted it as part of the Socio Economics and Tourism Report [APP-066]. This confirmed that the conclusions presented in the Scoping Report remained the same. ES Chapter 15: Cumulative Effects Assessment [APP-083] assesses the intra-project and inter-project cumulative effects on socio-economics and tourism and confirms that there would be no likely significant effects.</p> <p>No additional jobs are anticipated to be created as a result of the operational phase of the project.</p> <p>During construction, the project would not create a large number of jobs for the local area or require a large demand of the local workforce. The data on the estimated construction worker and types of workers is set out in the Socio Economics and Tourism Report [APP-066] and are all assumed to be site based. Paragraph 4.3.22 of the Socio Economics and Tourism Report [APP-066] also states that the majority of employment activities would require trained specialists who are qualified to work on high voltage electricity lines. These will be sourced through competitive tendering, with regard to the Utilities Contracts Regulations, from the Applicant's existing pool of approved framework contractors.</p>

Reference Question	Applicant's Response
	<p>From experience of other National Grid projects, it is likely that a minimum of 10% of the construction workforce would be sourced from the local labour market. It is likely that 90% would travel into the area from elsewhere and likely to already be employed by the Contractor; it is usual that the specialist staff move from one project to another. This level of local employment, based on a peak monthly employment assumption of 350 workers, could result in the peak monthly local job demand being up to approximately 35 jobs locally. Paragraph 4.3.22 also states that the Applicant considers that these 35 jobs can be accommodated from the local labour pool.</p> <p>The construction worker numbers in the Socio Economics and Tourism Report [APP-066] have been provided by one of the Applicant's Framework Contractors who is experienced in delivering this type of project. The resourcing levels have been overlaid on the construction schedule to generate the resource histogram used in the Socio Economics and Tourism report [APP-066].</p> <p>Given the low number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to this matter, the Applicant does not consider there to be a need to submit a more detailed workforce profile into Examination.</p> <p>The Applicant cannot commit to a specific numbers of construction workers, and it would not be appropriate to do so, as it is imperative that it appoints the right numbers of suitably qualified staff to deliver this Critical National Infrastructure by 2028.</p> <p>The Applicant promotes the use of local supply and small/medium enterprises through main construction contractors by embedded targets within its framework contracts. The Applicant will continue to work with relevant planning authorities and business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses.</p> <p>At a broader level, National Grid is committed to investing in the jobs, skills and people required to help deliver the energy transition. As set out above, whilst the number of jobs supported by the Bramford to Twinstead Reinforcement is relatively low and short-term when considered in isolation.</p> <p>When considered in the context of wider National Grid projects in the region there could be a more effective approach to leveraging benefits by considering regional interventions. The Applicant is working to fully understand the wider, regional scale of labour and skills demand in order to develop more sustainable, regional interventions in this regard. The Applicant is committed to continuing discussions with the host authorities and other key stakeholders to inform this strategy outside of the DCO process.</p>
<p>MG2.0.16 Can you advise whether an Employment, Skills and Education Strategy is being prepared for the proposed project? If not, why not?</p>	<p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level, as this is not considered to be an efficient or effective approach bearing in mind the low number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to this matter.</p> <p>National Grid is a regulated business and needs to demonstrate the planning case for such requirements on each of its projects. Under its licence obligations National Grids need to demonstrate to Ofgem how it is being economic</p>

Reference Question	Applicant's Response
	<p>and efficient in the interest of bill paying consumers. It is not considered that a specific Employment, Skills and Education Strategy is required for this project and would be disproportionate to the scale of the potential effect and National Grid's duty.</p> <p>The number of jobs supported by the project is relatively low and short-term, when considered in isolation. When considered in the context of wider National Grid projects in the region, the Applicant believes there could be a more effective approach to leveraging benefits. Outside of the DCO, the Applicant is therefore committed to exploring opportunities for regional interventions in skills and employment. This supports the overriding need to consider skills at a functional economic market area scale that is representative of how construction and maintenance labour markets operate and enables better long-term planning for transferable and sustainable skills and careers in growth sectors identified by the Local Authorities.</p> <p>Outside of the DCO the Applicant is working to fully understand the wider, regional scale of labour and skills demand in the region in order to develop more sustainable interventions in this regard. In the meantime, and whilst awaiting the outcome of the government's consultation on community benefits (following their minded to position), the Applicant is already running a number of programmes in the region to support employment, skills and education, including:</p> <ul style="list-style-type: none"> ● Recently launching a procurement partnership called 'The Great Grid Partnership'- this is a £4.5 Billion opportunity for supply chain partners to help deliver the Great Grid Upgrade. By engaging with the supply chain early it will give supply chain partners long term certainty, giving them confidence to invest and grow, creating greater economic investment to host communities by enabling local contracts, investing in training programmes and skills development and supporting local job creation. ● Partnering with the University of East Anglia to help with the employability prospects of students. National Grid staff have met with engineering students, conducted mock interviews to support employment, kick started a student research project for innovation (Summer 2023) and also mentoring young people in the annual 'Engineering Unlocked Summer School'. ● The Applicant has provided training and employment opportunities for young people through its Grid for Good Programme which reaches out to organisations such as schools, colleges and further education organisations, and provides careers coaching and masterclasses. Throughout 2023, a number of Grid for Good events were held across East Anglia, and this will continue into 2024. ● The Applicant is working with charities (e.g. a local refuge) to identify opportunities to leave a meaningful, positive legacy for the beneficiaries. ● The Applicant has donated repurposed laptops, iPads and iPhones to local schools, colleges and charities.

0.6 Socio-Economics and Other Community Matters: Businesses

Table 0.6 – Socio-Economics and Other Community Matters: Businesses

Reference	Question	Applicant's Response
MG2.0.17	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?	<p>The project impacts on the strategic road network (SRN) are set out in Chapter 7 and Appendix E of the Transport Assessment [APP-061]. This assessment concluded that project construction traffic would not have a substantial impact on the SRN, even with substantial contingency built into the forecast traffic numbers.</p> <p>Further assessment is also presented in ES Chapter 15: Cumulative Effects Assessment [APP-083] and ES Appendix 15.5: Inter Project Cumulative Effects Assessment [APP-144]. The latter concludes that the Bramford to Twinstead Reinforcement is expected to have negligible impacts upon the operation of the SRN during construction (the percentage increases on the sections of the A12 and A120 assessed would be less than 2% for the total daily construction traffic and 4% for daily heavy goods vehicles, during the AM and PM peak periods). Therefore, there would be no potential for cumulative effects with the other development during construction and consequently there would be a limited impact on business in Suffolk.</p> <p>Paragraph 3.1.1 in the Statement of Common Ground National Highways [REP3-022], sets out the agreement between the Applicant and National Highways that '<i>the impact of the project on traffic at junctions on the SRN is negligible in terms of absolute numbers of vehicles and as a proportion of existing traffic... As a result, no further assessment is required of the impact of the project on junctions on the SRN</i>'.</p>

0.7 Socio-Economics and Other Community Matters: Local Residents and Community

Table 0.7 – Socio-Economics and Other Community Matters: Local Residents and Community

Reference	Question	Applicant's Response
MG2.0.18	MG2.0.18-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?	National Health Service (NHS) statistics on bed availability and occupancy rates are available at NHS Trust level but are not available at individual healthcare facility level. Therefore, the Applicant is unable to confirm the capacity of the healthcare facilities listed in Table 3.8 of ES Appendix 15.1: Cumulative Effects Baseline [APP-140]. However, the capacity of the relevant NHS Trust (East Suffolk and North Essex NHS Foundation Trust) is provided at paragraphs 3.4.43 and 3.4.44 of ES Appendix 15.1: Cumulative Effects Baseline [APP-140], and this baseline informed the assessment of health in relation to the CEA reported in ES Chapter 15: CEA [APP-083]. ES Chapter 15: CEA [APP-083] concludes that as no particular vulnerabilities have been identified within the health of the local population, and given that the good practice measures outlined within the CEMP and CoCP [REP6-021 and REP3-026, respectively] would help to avoid and reduce potential impacts on the health of local communities, it is not anticipated that there would be effects on the health of local communities. While there is likely to be some

Reference Question	Applicant's Response
	<p>disruption to local communities during construction in terms of noise, dust, light and traffic, which would be the case of any construction site of similar developments, due to the nature of the linear project and transient nature of the works, communities in any given area would be affected for a shorter period of time than the overall construction duration. The impacts would cease once construction was completed. Therefore, although there would be cumulative effects on local communities during construction, these are considered to be not significant.</p>

1.0 Air Quality and Emissions

Table 1.0 – Air Quality and Emissions

Reference	Question	Applicant's Response
AQ2.1.1	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?	ES Chapter 13: Air Quality [APP-081] assesses the effects of dust, and emissions on human health based on standard guidance from the Institute of Air Quality Management (IAQM). In relation to dust, paragraph 13.6.7 of ES Chapter 13: Air Quality [APP-081] states that with the good practice measures from the CoCP [REP3-026] in place, the risk of dust impacts and their effects are expected to be short term and not significant. In relation to emissions, paragraph 13.6.11 of ES Chapter 13: Air Quality [APP-081] states that given the nature of the plant to be used and the good practice measures that would be in place, emissions are highly unlikely to cause an exceedance of the legislative limits and air quality objective values and would therefore be not significant. Therefore, the Applicant can confirm that it has considered potential impacts on health matters such as asthma in Es Chapter 13: Air Quality [APP-081].
AQ2.1.2	Paragraph 3.1.1 of your Greenhouse Gas Assessment [APP-092] refers to a total 111,484 tCO2e for the project (84,050 tCO2e construction and 26,133 + 1,301 tCO2e 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?	ES Appendix 4.3: Greenhouse Gas Assessment [APP-092] provides a quantitative assessment of the nature and magnitude of greenhouse gas emissions during construction and operation. A qualitative assessment of decommissioning impacts is provided in Section 4.10 of ES Chapter 4: Project Description [APP-072]. The assessment concludes that the carbon dioxide emissions from the project are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets. The Applicant is of the view that the ES assessments provided meet the expectations of paragraph 5.3.4 of the November 2023 NPS EN-1.
AQ2.1.3	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	The Applicant notes that, as described in the Need Case [APP-161], the project plays a key role in delivering the UK Government's net zero ambitions and delivering up to 50GW of offshore wind connected by 2030 to contribute to the growth in renewable energy and the decarbonisation of the UK. ES Appendix 4.1 Good Design [APP-090] discusses aspects of climate changes impacts and ES Appendix 4.3: Greenhouse Gas Assessment [APP-092] describes the use of the Carbon Interface Tool (CIT) during the construction stage of the project to form a 'carbon baseline' for the project. This will allow the Applicant to monitor the carbon performance of the main works contractor during the construction phase, the contractor being incentivised to reduce the carbon footprint against this initial baseline.

Reference	Question	Applicant's Response
	decommissioning phases of the Proposed Development?	<p>The majority of operational emissions arise from the transmission losses inherent to the equipment installed by the project, being a function of their electrical resistivity and the electrical current flowing through this equipment over the course of its operational life. Such losses are uncontrollable, however as clean/renewable generation on the UK electricity network is expected to continue to displace fossil-fuelled generation into the future, the emissions arising from transmission losses can be expected to decrease from present levels. See also Section 10.8 of the Applicant's Comments on Essex County Council and Braintree District Council's Local Impacts Reports [REP3-050].</p> <p>Carbon equivalent emissions in operation due to the use of sulphur hexafluoride (SF6) within the project have been mitigated where practicable as discussed in Section 2.6 of ES Appendix 4.1: Good Design [APP-090].</p> <p>Section 4.10 of ES Chapter 4: Project Description [APP-072] notes that the decommissioning works would follow National Grid processes at the time for assessing and avoiding or reducing any environmental impacts and risks whilst also taking account of good industry practice. The Applicant notes that many of the materials that would be removed during the decommissioning process would be recycled where practicable e.g., aluminium, copper and steel.</p> <p>In addition, Requirement 12 of the draft DCO [REP6-003] requires the Applicant to produce a written scheme of decommissioning which is to be submitted for approval by the relevant planning authority at least six months prior to any decommissioning works.</p>
AQ2.1.4	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?	<p>The Applicant's primary focus continues to be carbon reduction, and as opportunities to reduce emissions increase over time, it would look to unlock future opportunities to reduce residual emissions. Due to this, the Applicant would prioritise investment in additional decarbonisation actions over market-based offsets.</p> <p>If there is little else the Applicant could do, it may decide to offset residual emissions. Section 3.2 of the ES Appendix 4.3: Greenhouse Gas Assessment [APP-090] references the strategy within the current regulatory period to offset residual emissions at the end of 2025/26 in line with National Grid's Offsetting policy guidelines. As the Bramford to Twinstead Reinforcement would be in construction beyond this regulatory period, a consistent approach will be applied across all years of the project. The Applicant's approach and the long-term offsetting strategy are currently being defined and National Grid is carrying out extensive external engagement with leading experts across industry to inform a robust approach that will ultimately deliver wider sustainability benefits. The Applicant would take a hierarchy-based approach, working in preference with organisations that support the communities affected most through the project. The UK carbon market is evolving quickly and therefore the Applicant would either invest in projects that are recognised by an external framework, or in emerging areas of the market that provide alternative project types. Any projects not on recognised frameworks would have to align to National Grid's own governance framework which would be third party verified to ensure they are of the same standard.</p>

Reference	Question	Applicant's Response
AQ2.1.5	<p>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?</p>	<p>The Applicant notes that a Green House Gas (GHG) Reduction Strategy is a new requirement of the November 2023 draft NPS EN-1 which was not a requirement of the version of EN-1 at submission of the application for development consent.</p> <p>The 2011 versions of the NPS remain in force until the proposed revised NPS are designated in early 2024. Due to the transitional provisions, the application should be determined in accordance with the extant 2011 NPS suite, however the November 2023 updates are important and relevant considerations in the decision-making process.</p> <p>To this end, steps taken by the project to minimise and offset emissions are secured in other documents.</p> <p>Steps taken to minimise emissions are stated within Section 5.4 of the Materials and Waste Management Plan [REP3-032] and in particular the use of the CIT to create a 'carbon baseline' for the project and the incentivisation of the contractor to reduce the carbon footprint against the initial baseline.</p> <p>The Landscape Environmental Management Plan (LEMP) Appendix B: Vegetation Reinstatement Plan (document 7.8 (C)) details the location of proposed embedded planting, reinstatement planting, landscape softening, habitat compensation and additional planting required to mitigate an environmental effect, which would also provide a small amount of benefit to the provision of carbon stores and sinks. As noted in the Environmental Gain Report [APP-176], the planting proposals on several of the environmental areas identified would support enhanced function of the land in relation to biodiversity, soil carbon and soil hydrology.</p> <p>The Applicant is of the view that whilst a specific GHG Reduction Strategy has not been produced, the intent of a GHG reduction strategy has been met and secured via other submitted documentation.</p> <p>Please also refer to Appendix F of Issue B of the Planning Statement [REP6-011] for a commentary on compliance with EN-1 (November 2023).</p>
AQ2.1.6	<p>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?</p>	<p>At the point of assessment, the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 were not in force and so are not considered in the assessment. The Environment Targets (Fine Particulate Matter) (England) Regulations 2022 set mandatory targets for of PM2.5 ambient air concentrations. However, there is no requirement to update the assessment presented in ES Chapter 13: Air Quality [APP-081] because targets are not used in the Institute of Air Quality Management 'Guidance on the assessment of dust from demolition and construction' semi-quantitative risk-based approach that has been applied in the assessment.</p>
AQ2.1.7	<p>Can you summarise the effects on the air quality assessment if the latest background pollutant concentrations from the Defra data archive were used?</p>	<p>The Defra background air quality mapping projections from the 2018-base year dataset were used in the assessment which were current at the point of application. This is referenced in submission ES Chapter 13: Air Quality [APP-081] at paragraph 13.4.2 and 13.5.1. These remain current and appropriate for use in the assessment and so there is no change required to the air quality assessment.</p>

2.0 Approach to the EIA and the ES

Table 2.0 – Approach to the EIA and the ES

Reference	Question	Applicant's Response
EA2.2.1	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?	<p>A decommissioning assessment is provided in Table 4.9 of ES Chapter 4: Project Description [APP-072]. As stated in paragraph 4.10.13 of ES Chapter 4: Project Description [APP-072], this assessment takes into account the future baseline sections of ES Chapters 6 to 15 [APP-074 to APP-083]. Table 4.9 concludes that there are unlikely to be any new or different significant effects anticipated during decommissioning than those identified during construction in Chapters 6 to 15, and in many cases the effects are likely to be of a lower significance than construction due to the anticipated lower magnitude of effects anticipated during decommissioning.</p> <p>As stated in paragraph 4.10.13 of ES Chapter 4: Project Description [APP-072] the baseline could have changed at the time of decommissioning, outside of the changes noted in the future baseline sections of ES Chapters 6 to 15 [APP-074 to APP-083], and therefore this would be assessed at the time of decommissioning. At the point where the project requires decommissioning, the Applicant would implement an appropriate decommissioning strategy taking account of good industry practice, its obligations to landowners under the relevant agreements and all relevant statutory requirements applicable at such a time. Requirement 12 of the draft DCO [REP6-003] requires the Applicant to submit a written scheme of decommissioning for approval by the relevant planning authority at least six months prior to any decommissioning works.</p>
EA2.2.2	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 (PRoW)?	<p>An update to the Draft Statement of Common Ground East Anglia THREE Limited (document 8.3.6.4 (C)) has been submitted at Deadline 7. Discussions regarding the technical interface are ongoing and there has been no change to the baseline construction schedule as reported in ES Appendix 4.2: Construction Schedule [APP-091]. The Applicant has issued East Anglia THREE Limited a draft Heads of Terms in respect to the Interface Agreement on 24 November 2023, and the Applicant is awaiting feedback on this draft.</p> <p>With regard to cumulative effects, the inter-project CEA with the onshore development component of East Anglia THREE is provided in Table 2.1 (ID DCO-001) of ES Appendix 15.5: Inter-Project CEA [APP-144]. This considered cumulative effects for all topics including noise and vibration, air quality and PRoW. A temporal overlap in construction with the East Anglia THREE onshore development was assumed for the CEA as a worst-case scenario, and therefore it is considered that there would be no change to the inter-project CEA as reported in ES Appendix 15.5: Inter-Project CEA [APP-144].</p>

3.0 Biodiversity, Ecology and Nature Conservation, including HRA Matters

Table 3.0 – Biodiversity, Ecology and Nature Conservation, including HRA Matters

Reference	Question	Applicant’s Response
EC2.3.1	<p>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?</p> <p>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?</p>	<p>The Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6, which includes a full assessment of the project against the proposed revised NPS (November 2023) in the Accordance Tables contained at Appendix F (EN-1) and Appendix G (EN-5) of the Planning Statement [REP6-011] including the assessment of paragraph 2.10.8.</p> <p>The Applicant considers that the project strikes the correct balance in this regard by identifying appropriate aftercare at each location rather than a standard approach across the project. The Applicant will implement five years of planting aftercare across the project and provide longer aftercare at the identified locations that require it. For example, the five years of planting aftercare across the project consists mainly of the reinstatement of hedgerows and coppiced areas which is considered to be appropriate. The trees and woodland planting around the CSE compounds and GSP substation will be maintained for the life of the asset, and mitigation area MM09 to the north of Hintlesham Woods SSSI (connecting Hintlesham Woods and Wolves Wood) and in areas proposed for biodiversity net gain maintenance will be for 30 years. This proposal remains valid in light of proposed revised paragraph 2.10.8 of NPS EN-5 and is considered appropriate in the context of the limited and localised residual effects that are likely to occur as a result of the project.</p> <p>Nevertheless, the 2011 versions of the NPS remain in force until the proposed revised NPS are designated in early 2024. Due to the transitional provisions, the application should be determined in accordance with the extant 2011 NPS suite, however the November 2023 updates are important and relevant considerations in the decision-making process.</p>
EC2.3.2	<p>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</p>	<p>The implementation timetable is defined in Requirement 10 of the draft DCO [REP6-003] and states that ‘<i>Unless otherwise agreed with the relevant planning authority, all reinstatement planting works referred to in Requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use</i>’.</p> <p>The Applicant considers that there could be opportunities to bring some of the proposed planting forward, however this would be subject to land rights, practicalities such as physical space, the progression of commercial and contractual agreements, seasonal constraints, and availability of planting stock. The detailed programme has yet</p>

Reference	Question	Applicant's Response
	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?	<p>to be finalised; however, the Applicant will work with the main works contractor (once appointed) during the detailed design stage to consider opportunities to bring forward planting.</p> <p>As part of Requirement 9 of the DCO, the Applicant has committed to a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated for each stage of the project. The reinstatement planting plan will be submitted to, and approved by, the relevant planning authority; these plans will show the areas that have been identified for early planting.</p> <p>This commitment to consider opportunities where planting can be brought forward has been added to Section 8.1 of the LEMP at Deadline 7 (document 7.8 (C)). This will be secured through Requirement 4 of the draft DCO [REP6-003].</p>
EC2.3.3	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? Can you indicate if and when this may be shown as resolved in your SoCG?	<p>The Applicant included the new embedded measure EM-AB17 in the REAC [REP6-023] at Deadline 6 in response to feedback from Natural England and the Royal Society for the Protection of Birds</p> <p><i>'The Order Limits at Hintlesham Woods will be demarcated so that construction activities do not stray beyond the maintained swathe which is the same as the vegetation management that took place during the 2013 reconductoring works energisation'</i>.</p> <p>The Applicant is awaiting feedback from the parties as to whether this addresses the relevant matter within the respective Statement of Common Ground (SoCG).</p>
EC2.3.4	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?	<p>As noted in the Draft Statement of Common Ground Natural England [REP6-017], the Applicant submitted an updated draft Dormouse Licence to Natural England on 19 October 2023 to reflect Natural England's feedback on the application version, and Natural England provided feedback on this draft on 26 October 2023. The Applicant has further updated the draft dormouse licence to reflect these comments and has re-submitted this to Natural England on 12 January 2024. The Applicant is hopeful that these changes address the comments raised by Natural England and that a Letter of No Impediment will be issued for the project prior to the end of Examination.</p>
EC2.3.5	<p>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?</p> <p>Could this include a response to the</p>	<p>ES Chapter 4: Project Description [APP-072] describes that most construction work would take place within the core working hours between 07:00 and 19:00 and provides the list of a limited number of activities where works may be required outside of core hours. As stated in paragraphs 4.4.19 to 4.4.22, there is no intention for night working on the project as standard and that winter working requiring lighting may be required at contained work sites but not on a wide scale across the project. This was confirmed in the Applicant's response to CM1.5.15 in the First Written Questions [REP3-052].</p> <p>The assessment presented in ES Chapter 7: Biodiversity [REP6-009] was based on the assumptions in ES Chapter 4: Project Description [APP-072] and identified potential impact pathways from artificial lighting during construction across the project on a range of features that included sensitive designated sites, habitats and</p>

Reference	Question	Applicant's Response
	<p>request in Natural England's Written Representation [REP2-026] to confirm how your commitments to lighting and hedgerow protection would be secured?</p>	<p>species. As such, a project-wide assessment of potential construction lighting impacts was made and good practice measure GG20 in the CoCP [REP06-025] was provided to avoid significant effects at any location within or adjacent the Order Limits. The measure states that lighting would be of the lowest luminosity necessary to safely perform each task. It would also be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and sensitive habitats. Further details and commitments on lighting requirements are also presented in Chapter 6 of the CEMP [REP6-023].</p> <p>Natural England's comments on construction stage lighting and hedgerow protection in REP2-026 relate to Nationally Designated Landscapes with specific reference to the guidance issued by the AONB. <i>The Lighting Design Guide – Dedham Vale National Landscape & Coasts and Heaths National Landscape – Guidance to reduce light pollution and protect our dark skies</i> was published in July 2023. The Applicant has responded to say that it considers the project to be compliant with this guidance in Applicant's Comments on Relevant Representations, Table 3.14 [REP1-025]. The Draft Statement of Common Ground Natural England [REP6-017] notes that all matters are agreed in relation to Dedham Vale AONB.</p> <p>Commitments relating to protecting retained hedgerows are provided in Section 6.4 of the LEMP [REP3-034]. Commitments on lighting are contained in the CEMP [REP6-023] and CoCP [REP06-025]. The management plans and the measures contained within them, are secured through Requirement 4 of the draft DCO [REP6-003].</p>

4.0 Compulsory Acquisition, Temporary Possession and other Land or Rights Considerations

Table 4.0 – Compulsory Acquisition, Temporary Possession and other Land or Rights Considerations

Reference	Question	Applicant's Response
CA2.4.4	You are not listed in the Book of Reference [REP4-037]; is it correct in this respect?	The Applicant understands that the Prosser family have freehold interests in Plots 6-30 and 6-31 and are listed as such in Parts 1 and 2 of the Book of Reference. The Applicant is not aware of any further land interests associated with the environmental mitigation plots (including plots 6-24, 6-21, 6-29). Mr Francis Prosser is not currently included in the Book of Reference as he does not appear on the registered title. The land registry title refers to Jonathan Prosser and Patricia Prosser. The Applicant will contact Francis Prosser to confirm whether he has any interest in land owned by Jonathan Prosser and Patricia Prosser (or elsewhere). The Applicant will ensure that the Book of Reference is updated at Deadline 9 if any further land interests are identified for Francis Prosser.
CA2.4.8	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]?	<p>The existing 132kV pylon (PCB 67) is owned and operated by UK Power Networks (UKPN). Based on the available UKPN records dating from 1983, the Applicant understands this pylon to be a PL16 design of a standard height suspension type. At ground level, assuming a level site, the base of this pylon (back-to-back of the leg steelwork) is approximately 4.2x4.2m. The height of the tower is 26.44m above an approximate ground level of 56.7m AOD.</p> <p>The proposed 400kV pylon (RB41) is an L6M design of a suspension type extended 3m above standard height. At ground level, assuming a level site, the base of this pylon (back-to-back of the leg steelwork) is approximately 11.9x11.9m. The height of the pylon is 53.59m above an approximate setting level of 52.14m AOD.</p> <p>The Limits of Deviation, with reference to Article 5, Limits of Deviation of the draft DCO [REP6-003], are noted to any extent upwards not exceeding 4m. Therefore, the maximum height the proposed 400kV pylon (RB41) can be extended is 6m above the standard height (an additional 3m extension). At ground level, assuming a level site, the base of this pylon (back-to-back of the leg steelwork) would be 12.96x12.96m. The height of the pylon would be 56.59m above an approximate setting level of 52.14m AOD.</p> <p>The crossarms on each side of the PL16 suspension type pylon are 3.73m in length (top and bottom crossarms) and 4.65m in length (middle crossarms). By comparison, the crossarms on each side of the L6M design of a suspension type pylon are 8.44m in length (bottom crossarms), are 10.45m in length (middle crossarms), are 6.98m in length (top crossarms). All crossarm dimensions are lengths measured from the pylon centreline.</p>

Reference	Question	Applicant's Response
CA2.4.9	<p>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.</p>	<p>The assessment assumes the position shown on Work Plan, Sheet 16 [APP-10] for proposed 400kV pylon (RB41) noting that this is a sloping site therefore the setting level may alter. On the Proposed Alignment, within the area referred to as ASSN15-10 [ASSINGTON Neighbourhood Plan 2018 – 2036], the ground rises towards proposed pylon RB42 (to the west) to a maximum level of approximately 58m AOD and falls towards proposed pylon RB40 (to the east) to a maximum level of approximately 45m AOD.</p> <p>The Local Green Space, Mill Farm Land (ASSN10-10) is located to the south of Assington and has an existing 132kV pylon (PCB 67) and an existing 400kV pylon (4YL056) within the Green Space. The Applicant is proposing to remove the 132kV pylon and replace it with a 400kV pylon (RB41), similar in size and style to the existing 400kV pylon (4YL056) within the Green Space.</p> <p>The nearest publicly accessible location to the Green Space is along the PRoW (W-113/007/0), which follows the western boundary of the Green Space. Users of this footpath currently have views of the existing 132kV pylon (PCB 67) some 45m to the east. The lower parts of this pylon are seen against a backdrop of existing woodland, but the upper part is prominent on the skyline where it is seen alongside multiple 132kV and 400kV pylons.</p> <p>The proposed 400kV pylon (RB41) would be taller than the existing 132kV pylon PCB 67 (which would be removed) but would be of a similar size and appearance to the 400kV pylons to be retained. Based on the Proposed Alignment, as shown on Sheet 16 of the General Arrangement Plans [APP-018], pylon RB41 would be approximately 120m away from the PRoW. This would moderate its perceived height and impact on views from the PRoW and it would also be seen alongside pylons on the existing 400kV overhead line. As the proposed 400kV overhead line would replace the existing 132kV overhead and also be seen in the context of the existing 400kV at this location, this would result in a residual long-term minor adverse (not significant) effect. This is because pylons are already a key element in the view and the presence of the new 400kV pylon would not fundamentally change its composition or character when comparing the project to the baseline scenario.</p> <p>Based on the flexibility assumptions in terms of lateral and vertical limits of deviation set out in the response to Written Question CA2.4.8, pylon RB41 could be closer to the PRoW than shown on Work Plan 16 [APP-010] and the maximum height of the pylon could be 56.59m . This would inevitably increase its visibility from the footpath but would not affect the outcome of the assessment in relation to the village of Assington, that is presented in Section 2.3 of ES Appendix 6.5: Assessment of Effects on Communities [APP-108] as this is based on consideration of the general visual amenity across the parish rather than individual viewpoints.</p> <p>In terms of landscape character, the area that is subject to Policy ASSN-10 Local Green Spaces of the Assington Neighbourhood Plan is already influenced by the presence of multiple pylons and this situation would not change with the presence of a new taller 400kV pylon in association with the removal of the existing 132kV pylon.</p>

5.0 General Construction Matters

Table 5.0 – General Construction Matters

Reference	Question	Applicant's Response
CM2.5.1	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?	<p>The Outline Written Scheme of Investigation (OWSI) (document 7.10 (C)) details the archaeological methods that would be employed post application as follows:</p> <ul style="list-style-type: none"> Archaeological Open Area Excavation (OAE) is described in Section 4.2 of the OWSI (document 7.10 (C)). This details two locations within the Order Limits where OAE would be undertaken; south of Workhouse Green and either side of Moat Lane west of Lamarsh. It has been assumed this work would be carried out prior to construction in that specific location. The scale of works would be dependent on the scope of the Detailed Written Scheme of Investigation, which would be developed by the Archaeological Contractor, once appointed. However, an estimate of the number of workers required for each fieldwork location would be 5-10 operatives, for a period of 4-8 weeks prior to construction in that location. Strip Map and Sample (SMS) would occur during the Main Works Contractor's overburden removal at the outset of the construction phase. Archaeological attendance would be limited and largely supervisory, with overburden removal carried out using the Main Works Contractor's equipment and personnel under the direction of an archaeological banksman. As detailed in Section 5.2 of the OWSI (document 7.10 (C)), three locations have been identified for SMS; to the east of the River Box, the main site compound at Leavenheath and east of St Edmund's Hill. An allowance has been incorporated into the overall workforce figures to account for the archaeological supervision required. Watching brief is described in Section 6 of the OWSI (document 7.10(C)) and would be in place for the supervision and monitoring of groundworks undertaken by the Main Works Contractor during overburden stripping. A watching brief will be undertaken in a number of areas, as detailed in Figure 1 of the OWSI (document 7.10(C)), including underground cable trenches, pylon bases, access routes, laydown areas and construction compounds. The archaeological watching brief would occur alongside the main construction works detailed in the Baseline Construction Schedule shown in ES Appendix 4.2 [APP-091]. An allowance has been incorporated into the overall workforce figures to account for the archaeological supervision required.
CM2.5.2	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	As stated in paragraph 4.4.58 of ES Chapter 4: Project Description [APP-072], the EIA assumes that the main works compound off the A134 would have mains connections for electricity and potable water, but that wastewater would be taken off site in tankers. As services are present within the A134, there is no reason to believe that this

Reference	Question	Applicant's Response
	compound for a short period, and if not in place during the construction period?	<p>assumption cannot be realised during construction. However, if there was any delay in securing the connections or that it was not possible to connect to the services then the following would occur:</p> <ul style="list-style-type: none"> • Potable water required at the main site compound would be transported to site by tanker. As this would only be the water required at the main site compound (other areas are already assumed in the water deliveries), it would be limited in additional volume to that already assessed within the Transport Assessment [APP-061]. In addition, given the location off the A134 (a reasonable sized route), a limited number of additional heavy goods vehicles (HGV) delivering water each month would not affect capacity of the road or lead to any new or different significant effects in terms of traffic movements. • Power for the main site compound would be provided by diesel generators. As the main site compound lies away from sensitive receptor and as the good practice measures in the CoCP [REP3-026] would apply to generators at this site (as they would for the other compounds not connected to mains supply), there would be no change to the conclusions of the ES from using generators compared to mains power.
CM2.5.3	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]?	A detailed temporary works design would be required for the welfare cabins and offices to be installed at the temporary construction compounds which would be undertaken once the main works contractor is appointed. However, it is anticipated that cabins will be stacked no more than two units high, which would be to a height of approximately 6m, and these elements are likely to be the highest components within the compound.
CM2.5.4	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]).	<p>The Applicant notes the submissions on this topic made by Suffolk County Council at Deadline 6 (at Item 4.3 of Suffolk County Council's Post-Hearing Submission for the Fifth Issue Specific Hearing [REP6-056]) and has responded to the same at Deadline 7 in the Applicant's Comments on Other Submissions Received at Deadline 6 (document 8.9.4).</p> <p>Nevertheless, the Applicant's position remains as set out in Table 3.1, Item iii (Schedule 3, Requirement 7 of the draft DCO) of the Applicant's Written Summaries of Oral Submissions to Issue Specific Hearing 5 [REP6-042], namely that the inclusion of such definitions within the draft DCO [REP6-003] would be wholly inappropriate in the context of statutory drafting and also unnecessary taking account of the particular circumstances of the project.</p> <p>However, the Applicant proposes to provide additional clarification within the Explanatory Memorandum [REP6-005] at Deadline 8.</p>

6.0 Draft Development Consent Order

Table 6.0 – Draft Development Consent Order

Reference	Question	Applicant's Response
DC2.6.1	<p>Article 14(2), Power to alter layout, etc. of streets, refers to alteration of the layout of any street, including ancillary works, 'whether or not within the Order Limits'. 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?</p>	<p>As Paragraph 3.18 of the Explanatory Memorandum [REP6-005] explains, Article 14(2) of the draft DCO [REP6-003] is concerned with the carrying out of permanent or temporary alterations of layout (and other ancillary works) to any street within or outside the Order limits and also to any street having a junction with such a street.</p> <p>Sub-paragraphs (a) to (i) provide a non-exhaustive list of the works or operations which may be carried out by the undertaker pursuant to Article 14(2), subject in all cases to the prior consent of the street authority.</p> <p>Whilst the Applicant envisages that the exercise of street works powers pursuant to Article 14(2) would be undertaken predominantly within the public highway boundary, there is a potential that ancillary works or operations may in certain circumstances need to be carried out on land outside of that highway boundary.</p> <p>For example, the widening of existing footpaths, pavements or verges (Article 14(2)(b) and (d)) or the provision of facilities for the management and protection of pedestrians (Article 14(2)(g)) may necessitate the carrying out of works outside the "street" (as defined in Article 2(1) of the draft DCO). Similarly, it is conceivable that the relevant highway authority may require the provision or improvement of sight lines (Article 14(2)(i)) on land which is outside of the highway boundary.</p> <p>In this context, the Applicant notes the effect of Article 17, namely that any streets to be constructed or altered under the Order must be completed to the reasonable satisfaction of the street authority.</p> <p>In the event that works or operations associated with the exercise of powers pursuant to Article 14(2) were required to be carried out on land in third party ownership and outside the Order limits, it would be the undertaker's responsibility to obtain all necessary prior consents or approvals from the affected third parties, including where any new land was required to be formally dedicated as public highway. This reflects the base premise that the Applicant is only seeking compulsory acquisition and/or temporary possession powers in respect of the 'order land' (as defined in Article 2(1)), and not outside the Order limits.</p>
DC2.6.2	<p>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?</p>	<p>Sub-sections 120(3) and (4) and Paragraph 17 of Part 1 of Schedule 5 to the Planning Act 2008 provide that particular provision may be made in a development consent order for "<i>The stopping up or diversion of highways</i>", without qualification.</p> <p>Article 11 (temporary stopping up of streets) of the General Model Provisions (and upon which the draft DCO [REP6-003] is based, as Paragraph 2.1 of the Explanatory Memorandum [REP6-005] explains), refers specifically to the temporary stopping up, alteration or diversion of any street.</p>

Reference	Question	Applicant's Response
		<p>Many DCOs made by the Secretary of State also contain substantially similar provisions. For instance, both The National Grid (Hinkley Point C Connection Project) Order 2016 (at Article 13) and The National Grid (Richborough Connection Project) Development Consent Order 2017 (at Article 13) refer to the temporary <i>stopping up</i> of streets and public rights of way.</p> <p>Other recent examples include: The A47/A11 Thickthorn Junction Development Consent Order 2022 (at Article 16). The A47 Wansford to Sutton Development Consent Order 2023 (at Article 16), and The Awel y Môr Offshore Wind Farm Order 2023 (at Article 11).</p> <p>For these reasons, and notwithstanding the fact that other recent DCOs do refer to 'closure', 'close' and 'closed', the Applicant considers that existing references in Article 15 to 'stopping up', 'stop up' and 'stopped up' remain appropriate.</p>
DC2.6.3	<p>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?</p>	<p>The Applicant notes that Article 15(1) of the draft DCO [REP6-003] provides a power to temporarily stop up, alter or divert any street or PRoW shown on the Access, Rights of Way and Public Rights of Navigation Plans [APP-012] or within the Order limits. The exercise of that power is subject to the further provisions set out in the remainder of Article 15 (including consent of the street authority for streets not listed in Schedule 7 (Article 15(5)(b))) and to the controls contained within the PRoW Management Plan [REP3-056].</p> <p>It is important to note that Article 15(1) does not therefore authorise any works or operational development to be undertaken either within or outside the Order limits.</p> <p>Although discharge of the obligation imposed under Article 15(3) (namely to provide reasonable access for pedestrians to premises affected by the temporary stopping-up, alteration or diversion where there would otherwise be no reasonable access) could <i>in theory</i> require certain works to be carried out beyond the Order limits, such an eventuality is considered remote given that the Applicant has carefully designed the project so as to ensure that any alternative accesses can be provided within the Order limits.</p>
DC2.6.4	<p>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?</p>	<p>Article 15(2) of the draft DCO [REP6-003] permits the undertaker to use any temporarily stopped-up, altered or diverted street or PRoW as a temporary construction site.</p> <p>Paragraph 3.19.3 of the Explanatory Memorandum [REP6-005] explains the rationale underpinning this provision.</p> <p>The Applicant would however emphasise that the use of any street or PRoW for this purpose avoids the need for the undertaker to temporarily acquire other land and interests beyond the highway boundary for the same purpose, thereby ensuring that the overall extent of interference with existing rights and interests is kept to an absolute minimum.</p> <p>It is also worth noting, for the avoidance of doubt, that the Applicant has no intention of stopping up, altering or diverting a street or PRoW simply because it would be expedient to establish a temporary construction compound at that location. The ability to site a temporary compound in those locations is of secondary importance.</p>

Reference	Question	Applicant's Response
		<p>More generally, the exercise of temporary stopping-up, alteration and diversion powers pursuant to Article 15 of the draft DCO is ultimately constrained by sub-paragraph (5).</p> <p>Sub-paragraph (5)(a) requires the undertaker to consult with the street authority before stopping-up, altering or diverting the streets listed in Schedule 7 to the draft DCO [REP6-003], whilst sub-paragraph (5)(b) requires the street authority's prior consent before any other street or PRoW within or adjacent to the Order limits can be temporarily stopped-up, altered or diverted.</p> <p>Impacts on pedestrians, cyclists, horse riders and other street users arising from the exercise of powers pursuant to Article 15 have been assessed and the Applicant notes the controls contained within the Public Right of Way Management Plan [REP3-056], compliance with which is secured through Requirement 4 of Schedule 3 to the draft DCO.</p> <p>Article 15(8) provides for an entitlement to compensation in the event that any loss is suffered as a result of the temporary suspension of any private right of way.</p>
	<p>2. Did your Equality Impact Assessment [REP3-047] take account of the potential scope of operation Article 15?</p>	<p>The Applicant confirms that the Equality Impact Assessment (EqIA) [REP3-047] had regard to the scope of temporary stopping-up, alteration and diversion powers afforded pursuant to Article 15 of the draft DCO [REP6-003].</p> <p>Amongst other things, the EqIA considered equality impacts related to construction of the project and was informed by the outputs of the Applicant's Environmental Impact Assessment (EIA).</p> <p>As ES Chapter 4: Project Description [APP-072] makes clear, the EIA was undertaken in respect of the project proposals as a whole, including the information pertaining to stopping-up, alteration and diversions of streets and PRoW as shown on the Access, Rights of Way and Public Rights of Navigation Plans [APP-012].</p> <p>The Applicant notes that the EqIA considered specifically in this context disruption and severance to PRoW arising as a result of temporary diversions and closures of PRoW initiated during construction of the project. The Applicant also refers in this context to its response to TT2.13.5 below.</p>
<p>DC2.6.5</p>	<p>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</p>	<p>The Applicant refers to its response to DC2.6.4.</p>

Reference	Question	Applicant's Response
	draft wording or, if included elsewhere, signpost it?	
DC2.6.7	<p>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?</p>	<p>Whilst shorter than the notice periods prescribed by the Neighbourhood Planning Act 2017 (noting that the relevant sections of that Act are not yet in force and that the proposed temporary possession regime may therefore be subject to change), the Applicant considers that the notice periods set out under Articles 26(2), 27(2) and 28(3) of the draft DCO [REP6-003] are reasonable and equitable.</p> <p>The majority of the land within the Order limits is agricultural land.</p> <p>The Applicant has already engaged extensively with owners and occupiers of the land affected and will continue to communicate its intentions in this respect through regular dialogue. In particular, the appointment of a Land Officer/Agricultural Liaison Officer (see Table 3.1 of the CEMP [REP6-021]) means that in practice all affected owners and occupiers will receive greater notice than is prescribed in the draft DCO [REP6-003].</p> <p>However, given that the Applicant is subject to a statutory duty pursuant to the Electricity Act 1989 to act in a manner which is 'coordinated, economic and efficient', and taking account also of the urgent need for the project as set out in the Need Case [APP-161], it is necessary to prescribe as a fall-back or safeguard position a much shorter notice period than is provided for in the Neighbourhood Planning Act 2017 so as to enable the Applicant to progress construction of the project in a timely manner.</p> <p>The Applicant notes that the respective 14 day and 28 day notice periods were included in other development consent orders made by the Secretary of State, including The National Grid (Hinkley Point C Connection Project) Order 2016, The National Grid (Richborough Connection Project) Development Consent Order 2017, and The Southampton to London Pipeline Development Consent Order 2020. Substantially similar provisions were also included in, amongst others, The Sizewell C (Nuclear Generating Station) Order 2022, The Longfield Solar Farm Order 2023 and The Awel y Môr Offshore Wind Farm Order 2023.</p>
DC2.6.9	<p>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:</p> <ol style="list-style-type: none"> 1. Is this a fair, reasonable and proportionate duty to impose on them? 2. In terms of potential delay to the determination of current planning 	<p>The Applicant is grateful to the Examining Authority for drawing attention to this particular aspect of the operation of Article 53 of the draft DCO [REP6-003].</p> <p>The Applicant agrees with the Examining Authority's interpretation of Article 53(3) insofar as it would automatically apply to any extant planning application(s) falling within the scope of Article 53(1) and (2) and awaiting determination on the date on which the Order was to come into force.</p> <p>Therefore, and in response to the particular questions posed by the Examining Authority, the Applicant would suggest that the definition of "exempt applications" (at Article 53(7)) be modified as follows (modifications shown in red text):</p> <p><i>"exempt applications" means</i></p> <p><i>(i) an application for planning permission which relates to development that—</i></p>

Reference	Question	Applicant's Response
	applications, is it fair, reasonable and proportionate to applicants?	<p><i>(a) consists of an alteration to an existing building, or the change of use of an existing building or land; and</i></p> <p><i>(b) does not involve, or is not likely to involve, any construction engineering or other operations below existing ground level,</i></p> <p><i>(ii) an application for planning permission which is to be determined by a relevant planning authority in the period of 21 days beginning on the day after the date on which the Order comes into force; and</i></p> <p>The effect of the proposed modification to Article 53(7) would be to prevent any delay to the determination of planning applications which were otherwise due to be determined in the first 21 days following the Order coming into force. Any planning applications falling within the scope of Article 53(1) and (2) and due for determination after the expiry of that initial 21-day period would remain subject to the Article 53(3) consultation mechanism.</p> <p>In parallel, the Applicant would expect the relevant planning authorities to agree through the Planning Performance Agreement to a commitment to provide the Applicant with reasonable advance notice of all planning applications falling within the scope of Article 53(1) and (2) and due for determination in the period between the close of the Examination and the date of the Order coming into force, such that the Applicant would be able to make any necessary representations promptly.</p> <p>The Applicant considers that this approach to be fair, reasonable and proportionate from the perspective of all concerned parties, including both relevant planning authorities and third-party applicants.</p>
DC2.6.10	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]?	The approximate areas given in Table 4.1 of the CEMP [REP6-023] are consistent with the zone shown for the temporary construction compounds on the General Arrangement Plans [APP-018] and have been rounded to the closest 0.1 ha.
DC2.6.11	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?	<p>The Applicant notes the submissions on this topic made by Suffolk County Council at Deadline 6 (at Item 4.3 of Suffolk County Council's Post-Hearing Submission for the Fifth Issue Specific Hearing [REP6-056]) and has responded to the same at Deadline 7 in the Applicant's Comments on Other Submissions Received at Deadline 6 (document 8.9.4).</p> <p>Absent any further comments from the other host authorities, the Applicant considers that the locations of the proposed temporary construction compound locations are suitably secured by their inclusion within Table 4.1 of the CEMP [REP6-021], noting that compliance with the CEMP is itself secured through Requirement 4 of the draft DCO [REP6-003].</p> <p>In any event, the location of the temporary construction compounds is restricted by the position of the proposed Order Limits and the practicalities of where the compounds need to be located along the project route. Reference</p>

Reference	Question	Applicant's Response
		<p>in this context is made to the Applicant's Written Summary of Oral Representations to Issue Specific Hearing 1 [REP1-024].</p>
DC2.6.14	<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> <ul style="list-style-type: none"> (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>If the listed Management Plans were to be accepted as the final control documents at the close of the Examination, then (pursuant to Requirement 4 of the draft DCO [REP6-003]) they would become legally binding documents which the Applicant and its contractor would be obliged to comply with, including when undertaking any "pre-commencement operations".</p> <p>The relevant planning authorities and any other third party would be able to raise and investigate matters of non-compliance and seek to initiate legal proceedings in such cases.</p> <p>A legal challenge alleging non-compliance would significantly delay the project, be expensive and would also likely damage the Applicant's reputation. Therefore, as a responsible business subject to its own statutory duties, the Applicant intends to apply a rigorous tendering process to appoint a competent contractor to deliver the project and would undertake its own regular inspections to ensure compliance with the Management Plans.</p> <p>Each of the Management Plans details the relevant steps to be undertaken in the event of non-compliance. For example, Section 15.3 of the CEMP [REP6-021], states that the appropriate enforcing authority would be contacted and informed in such circumstances.</p>
DC2.6.15	<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</p>	<p>The Applicant does not consider that any further information is required to go into the Management Plans following Examination. The Management Plans provide the framework and parameters within which the Applicant would need to deliver the project to deliver the required mitigation to avoid likely significant effects and manage the potential for environmental effects from construction activities. The measures within the management plans centre around best practice and industry standards. Where a later discharge of specific information that cannot be provided at this point is thought appropriate, provision has been made for this information within the draft DCO.</p> <p>Requirements 8, 9 and 10 of the draft DCO] [REP6-003] secure a later discharge with the relevant planning authorities in respect of LEMP Appendix A: Vegetation Retention and Removal Plan (document 7.8.1 (B)), LEMP Appendix B: Vegetation Reinstatement Plan (document 7.8.2 (C)) and LEMP Appendix C: Planting Schedules</p>

Reference	Question	Applicant's Response
	<p>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. 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>	<p>(document 7.8.3 (B)), to provide the relevant planning authorities with details of the vegetation affected and the planting proposals once confirmed.</p> <p>Requirement 6 of the draft DCO [REP6-003] secures the Detailed Written Scheme of Investigation, which would be approved by the relevant planning authorities, setting out the details required to manage archaeological risk and mitigation during construction.</p> <p>The Applicant considers further detail (beyond that required as an outcome of the EIA as incorporated within the current draft management plans) relating to the delivery of the project are between it and its Main Works Contractor to allow flexibility to deliver the project in the most efficient and effective manner. A requirement to provide additional details, such as detailed contract documents and risk assessments, to the relevant planning authorities at a later date is unnecessary, is likely to delay the urgent delivery of the project and could also result in commercial implications and disputes. In addition, as the Applicant will assume ultimate responsibility for the safe delivery of the project and the final design (including any liabilities arising from the same), it considers that it needs to retain the flexibility to deliver the project in the way that it considers safe and effective. The Applicant is a responsible developer (licenced by the Electricity Act as the electricity transmission operator in England and regulated by Ofgem) that is used to delivering infrastructure projects across the country, many of which are undertaken using its permitted powers. The Applicant does not consider it appropriate for the relevant planning authorities to have a role in the detailed management and delivery of this high voltage electricity transmission project, which is being sought by the relevant planning authorities through the provision of detailed Management Plans through Requirement 4 of the draft DCO [REP6-003].</p>
DC2.6.16	<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>Taking account of the matters stipulated by the Examining Authority in DC2.6.16, the Applicant suggests, on a strictly without prejudice basis, the following by way of alternative wording for Requirement 4:</p> <p><i>Management Plans</i></p> <p>4—(1) <i>No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, and in the case of the Construction Traffic Management Plan, the relevant highway authority—</i></p> <p>(a) <i>A Construction Environmental Management Plan (which must be substantially in accordance with the Outline Construction Environmental Management Plan);</i></p> <p>(b) <i>A Materials and Waste Management Plan (which must be substantially in accordance with the Outline Materials and Waste Management Plan);</i></p> <p>(c) <i>A Construction Traffic Management Plan (which must be substantially in accordance with the Outline Construction Traffic Management Plan);</i></p>

Reference	Question	Applicant's Response
	<p>(a) Construction Environmental Management Plan.</p> <p>(b) Materials and Waste Management Plan.</p> <p>(c) Construction Traffic Management Plan.</p> <p>(d) Landscape and Ecological Management Plan.</p> <p>(e) Public Rights of Way Management Plan.</p>	<p><i>(d) A Landscape and Ecological Management Plan (which must be substantially in accordance with the Outline Landscape and Ecological Management Plan); and</i></p> <p><i>(e) A Public Rights of Way Management Plan (which must be substantially in accordance with the Outline Public Rights of Way Management Plan).</i></p> <p><i>(2) All construction works forming part of the authorised development must be carried out in accordance with the plans listed in sub-paragraph (1) above, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, and in the case of the Construction Traffic Management Plan, the relevant highway authority.</i></p> <p><i>(3) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the Outline Construction Environmental Management Plan, the Outline Materials and Waste Management Plan, the Outline Construction Traffic Management Plan, the Outline Landscape and Ecological Management Plan and the Outline Public Rights of Way Management Plan unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, and in the case of the Outline Construction Traffic Management Plan, the relevant highway authority.</i></p>
		<p>The Applicant would also anticipate consequential amendments being made to the draft DCO [REP6-003] as follows:</p> <p>(a) To the following defined terms in Article 2(1) and Schedule 17 so as to reflect the fact that existing documents submitted as part of the Examination and referenced in the draft DCO [REP6-003] would then be 'Outline' versions of the same: Construction Environmental Management Plan, Materials and Waste Management Plan, Construction Traffic Management Plan, Landscape and Ecological Management Plan and Public Rights of Way Management Plan;</p> <p>(b) Article 46, where reference is currently made in sub-paragraphs (1), (2) and (3) to the CEMP. References would instead need to be to the particular CEMP as approved pursuant to sub-paragraph (1) of Requirement 4;</p> <p>(c) Article 49, where reference is currently made in sub-paragraph (8) to the LEMP [REP3-034]. Reference would instead need to be to the particular LEMP [REP3-034] as approved pursuant to sub-paragraph (1) of Requirement 4; and</p> <p>(d) Requirements 8 and 9, where reference is currently made in sub-paragraphs (3) and (4), respectively, to the LEMP [REP3-034]. Reference would instead need to be to the particular LEMP [REP3-034] as approved pursuant to sub-paragraph (1) of Requirement 4.</p>
		<p>For the avoidance of doubt, the above wording is submitted solely on a without prejudice basis and is not reflective of the Applicant's primary contention. There remains disagreement between the Applicant and the relevant planning authorities over what should be contained within the Management Plans (for example whether or not an absolute cap on vehicle numbers should be included within the CTMP). These disagreements are not</p>

Reference	Question	Applicant's Response
		<p>due to a lack of design detail being available but because the parties disagree about what detail it is necessary and proportionate to secure in the Management Plans. This disagreement would remain regardless of whether the plans are considered "outline" or "final" and requiring the Applicant to seek approval for these plans again prior to construction is unlikely to change either parties' position. Therefore, inclusion of the amended Requirement 4 above could result in a delay during discharge of the Requirement, which in turn could affect timescales for project delivery.</p> <p>If the above alternative wording were adopted by the ExA, then there would be programme implications as set out by the Applicant in evidence to date.</p>
DC2.6.17	<p>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]).</p> <p>Nevertheless, can you concisely explain why you perceive Requirement 12, Decommissioning, to be deficient as written?</p>	<p>For the avoidance of doubt, the Applicant's position remains as set out in the Applicant's Comments on Responses to First Written Questions [REP4-029], namely that Requirement 12 (Decommissioning) in Schedule 3 to the draft DCO [REP6-003] suitably addresses the particular point concerning decommissioning, and hence no further or amended Requirement is needed.</p>
DC2.6.21	<p>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?</p>	<p>Given that details related to construction lighting proposals are already set out in Section 6.4 of CEMP [REP6-021], and noting also that the CEMP is not subject to the same legal limitations as apply to Requirements generally (see, for example, Paragraph 15.2 of Advice Note 15: "...Requirements should therefore be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects"), the Applicant's view is that the CEMP therefore represents the most appropriate vehicle through which to take account of the particular matters raised by the Councils.</p> <p>The Applicant would reemphasise in this context that compliance with the CEMP, and indeed with all of the Management Plans, is secured through Requirement 4 of the draft DCO [REP6-003].</p>

8.0 Historic Environment

Table 8.0 – Historic Environment

Reference	Question	Applicant’s Response
HE2.8.2	<p>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?</p>	<p>The Applicant has submitted all available interim trial trenching reports to the relevant local planning authorities for review through its ongoing data sharing between the parties. The Applicant is not intending to produce an interim trial trenching report for the final trial trenching survey completed in November 2023, however the relevant local authorities have been kept up to date will the results of the survey and have been in daily contact with the field archaeology unit to confirm trenches can be closed after evaluation. The results of this final stage of archaeological trial trenching will be included in the final trial trenching report (covering all phases of trial trenching) and submitted to the local planning authorities by March 2024, in accordance with the Detailed Written Scheme of Investigation for this work. No further trial trenching is proposed by the Applicant on the project.</p> <p>The Applicant has not submitted the trial trenching survey reports into Examination, as it considered this information to be detailed baseline data that was not necessary to support the application for development consent, similar to local records centre data for ecology and the geophysical survey results. However, the trial trenching reports can be submitted into Examination if the Examining Authority consider these to be of use. The ES has assessed a worst-case scenario and the trial trenching results would not change the results of the assessment presented in ES Chapter 8: Historic Environment [APP-076]. Whilst archaeological remains were found during the trial trenching programme, these are not considered to be of sufficient importance to warrant any changes to the mitigation recommended.</p>
HE2.8.4	<p>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</p>	<p>The compendium of paintings linked with Benton End from Babergh and Mid Suffolk District Council [REP5-030] serves to illustrate that, as described in the Technical Note on Cultural Associations [REP5-028], the focus of the painters of the East Anglian School of Painting and Drawing was largely confined to Benton End and its immediate gardens. The one notable painting detailed which is focused on the landscape along the lane to the south-east of the Benton End (Plate 8) is by Mollie Russell-Smith and is a relatively recent discovery which is undated [REP5-030]. It is therefore unknown if, at the time that the painting was made by Russell-Smith, the existing overhead lines were already in existence, and they were either omitted by the painter or were not visible in this viewpoint.</p> <p>The Applicant considers that the Technical Note on Cultural Associations [REP5-028], as submitted, provides a sufficient explanation of how the assessment of the impact of the project on the heritage receptors within of the Brett valley took into consideration cultural associations. The assessment is in accordance with the draft NPS EN-1 which states in paragraph 5.9.1 that: <i>‘Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called ‘heritage assets’. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of</i></p>

Reference Question	Applicant's Response
<p>how cultural associations were considered in the landscape and historical assessments.</p> <p>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?</p> <p>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?</p>	<p><i>these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting.'</i></p> <p>The Technical Note details the assessment of heritage values for the heritage assets identified by Babergh and Mid Suffolk District Council, including the contribution of their settings and the impact of the proposals on them. This followed a historic environment methodology which is in accordance with the NPS and concludes that the replacement overhead line, within the settings of Benton End and Overbury Hall, would not harm any of the heritage receptors key values and would have a neutral and a minor adverse effect, respectively. These effects cannot be considered to be significant environmental effects and would result in 'less than substantial harm' in terms of the NPS framework.</p> <p>The Applicant is confident that a robust assessment has been undertaken and the Technical Note provides supporting information behind the results presented in ES Chapter 8 Historic Environment [APP-076] and ES Appendix 8.2 Historic Environment Impact Assessment [APP-127]. The Applicant, therefore, considers the cultural associations of Benton End and the Brett Valley to have been assessed in full and no further information which undermines this assessment has been provided to the Examination. It should be noted that Historic England, as the relevant statutory body, has not raised any concerns in respect of the impact of the proposed replacement overhead line at these locations in the Brett Valley.</p>
HE2.8.8	<p>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?</p> <p>The Applicant updated the wording of embedded measure EM-AB01 in the REAC [REP6-023] at Deadline 6 in response to further feedback from Historic England. Historic England has confirmed that this wording is acceptable, as evidenced in the Statement of Common Ground within Historic England submitted at Deadline 7, which has all matters agreed (document 8.7.2 (B)).</p>

Reference Question	Applicant's Response
HE2.8.9	<p>The applicable legal framework for impacts within the settings of Listed Buildings is set out in The Planning (Listed Buildings and Conservation Areas Act) 1990. The Act establishes in Section 66(1), in the determination of applications affecting Listed Buildings, that ‘...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’</p> <p>The courts have held (see the case of <i>North Norfolk District Council v Secretary of State for Communities and Local Government</i>) [2014] EWHC 279 (Admin)) that taken as a whole, the statutory requirements in respect of Listed Buildings to have regard to the ‘desirability of preserving’ equates with the planning framework provided in the NPPF. where it states that great weight should be given to the conservation of a designated heritage asset and that clear and convincing justification should be required for any harm or loss [paragraphs 199 and 200 in the current NPPF (DLUHC, 2023)]. Whilst it is correct that Section 66(1) applies the presumptive desirability directly to the setting of a listed building, while in the NPPF the advice is directed to the significance of the asset itself, this distinction was not considered to be of any significance in the judgement of the court.</p> <p>The draft NPS EN-1 (DECC, 2023) generally equates with the NPPF in applying the test of ‘less than substantial harm’ and regarding the great weight to be given to a heritage asset’s conservation. Therefore, the advice in the caselaw quoted above would also apply.</p> <p>In order to reduce any harm to the heritage assets as far as possible, the Applicant has engaged in consultation with the local planning authorities and Historic England regarding Hintlesham Hall, dating back to 2013 (the latter was then named English Heritage). The proposed overhead line uses the optimised alignment around Hintlesham Hall which was agreed during that consultation process.</p> <p>Furthermore, discussions between National Grid and Historic England have agreed a number of proposals to enhance the character of Hintlesham Hall’s historic parkland setting including landscape and visual softening measures and historic parkland restoration. These proposals have been published in the Environmental Gain Report [APP-176] and the LEMP Appendix B: Vegetation Reinstatement Plans (document 7.8.2 (C)).</p> <p>Following the Applicant’s most recent engagement with Historic England, to discuss the micro-siting of pylons within the Limit of Deviation at Hintlesham Hall, a commitment has been included as embedded measure EM-AB01 in the REAC [REP6-023] for Deadline 6 so as not to cause avoidable harm. Subsequently, a SoCG between the Applicant and Historic England has been agreed for Deadline 7 with no matters outstanding.</p> <p>The draft NPS EN-1 (DESNZ, 2023), under paragraph 5.9.26, states that ‘<i>The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification</i>’. Paragraph 5.9.30 of the draft NPS also, states: <i>Where the proposed development will lead to less than substantial harm to the significance of the designated heritage</i></p>

Reference Question**Applicant's Response**

asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.

In the case of Hintlesham Hall, whilst a minor adverse effect is predicted in the assessment, this harm is fully outweighed by the wider public benefits of the project. Paragraph 5.9.34 of the NPS states that '*When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.*'

Paragraph 208 of the NPPF (December 2023) states that '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*'

The Planning Practice Guidance (MHCLG, 2019) states under 'What is meant by the term public benefits? that' '*Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.*'

9.0 Landscape and Views, including Trees and Hedgerows

9.1 National Landscape and Landscape Assessment

Table 9.1 – National Landscape and Landscape Assessment

Reference	Question	Applicant's Response
LV2.9.1	<p>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.</p>	<p>Levelling-up and Regeneration Act (LURA) 2023</p> <p>The Applicant submitted an updated Planning Statement [REP6-011] at Deadline 6, where it was noted at paragraph 7.9.91 that, Section 245 'Protected landscapes', of the LURA states: <i>'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty....'</i></p> <p>The clause expands the duty on certain public authorities, including Statutory Undertakers (including the Applicant), when carrying out functions in relation to these landscapes to seek to further the statutory purpose and confers a power to make provision as to how they should do this.</p> <p>The legislation has been expanded from 'having regard' to 'furthering the purpose' of protected landscapes such as AONB. The expanded duty will not come into force until two months from the date on which the LURA was enacted. Therefore, it may be that further provisions are made to prescribe the redefined statutory duties more closely.</p> <p>In any event, the Applicant considers the project is compliant with the new 2023 Act obligation as set out above, as the project:</p> <ul style="list-style-type: none"> a) proposes to underground the proposed 400kV overhead line within the AONB and beyond its boundary and the Stour Valley which forms part of its setting; and b) proposes the removal of the existing 132kV overhead line within the AONB, and removal of 132kV and 400kV overhead line within the setting (Stour Valley), resulting in a net loss of overhead line infrastructure in this designated landscape (furthering the purpose). <p>Protected Landscapes will also have a key role in the development and delivery of Local Nature Recovery Strategies (LNRS). The Government also published guidance on LNRS in 2023 (Defra, 2023) and brought forward amendments to the LURA to provide more clarity for plan-makers on how they should take account of LNRS. The project falls within the administrative boundaries of Mid Suffolk District Council, Babergh District Council, Braintree District Council, Suffolk County Council and Essex County Council. Partners in Essex have formed The Essex Local Nature Partnership (LNP). The LNP are working closely with Essex County Council and partners to produce</p>

Reference Question	Applicant's Response
	<p>the LNRS for Essex. The LNP formed a 'Local Nature Recovery Strategy Working Group' who will work towards creating the LNRS. Meanwhile, Suffolk County Council has been designated as the responsible authority for developing Suffolk's LNRS. At present, there are no adopted LNRS in place for the project to consider; as such, the Applicant considers the duty to have regard to LNRS in this respect is not yet fully engaged.</p> <p>In conclusion, and as stated in the Planning Statement [REP6-011], the Applicant does not consider that the LURA has any impacts on the project or the impact assessments that have been submitted as part of the application for development consent.</p> <p>Rebranding to National Landscapes</p> <p>The Glover Review of Designated Landscapes in 2019 (Glover, 2019) recommended AONB should be renamed to National Landscapes. Then, in 2022, the government responded to the Glover Landscapes Review and agreed that the national significance of AONB should be 'reflected in their name' (Defra, 2023). The rebranding was subsequently launched on 22 November 2023. The Applicant does not consider that the rebranding has any impacts on the project or the impact assessments that have been submitted as part of the application for development consent.</p>
<p>LV2.9.2 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?</p> <p>Are you able to provide examples of comparable projects where compensation has been provided in this way?</p>	<p>The Applicant has undertaken a statutory EIA in accordance with the Infrastructure Planning (EIA) Regulations 2017 (the EIA regulations), which describes the likely significant effects that are anticipated as a result of the project and the measures proposed to mitigate (and compensate) these. All of the proposed mitigation is secured including within the Management Plans, in particular the REAC [REP6-023]. The Management Plans, including the REAC, are secured through Requirement 4 of the draft DCO [REP6-003]. Therefore, the Applicant considers that the mitigation (including compensation) required in accordance with the EIA Regulations 2017 is already secured as part of the application for development consent.</p> <p>In terms of the additional compensation sought by the Local Planning Authority, and on a strictly without prejudice basis, the Applicant notes that such proposals are often considered in the context of Section 106 of the Town and Country Planning Act 1990 (and in respect of NSIPs, Section 174 of the Planning Act 2008 which addresses development consent obligations) and Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 which sets out tests, such that a "planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—</p> <ul style="list-style-type: none"> (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development." <p>The relevant energy NPS EN-1 (2011) provides (paragraph 4.1.8) that the Secretary of State "may take into account any development consent obligations that an applicant agrees with local authorities" and (that they must be, "relevant to planning; necessary to make the proposed development acceptable in planning terms; directly</p>

Reference Question**Applicant's Response**

related to the proposed development; fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects”).

However as set out below the Applicant submits that the tests for a legal agreement pursuant to the above provisions, are not met here.

As noted above, one component key test (pursuant to Regulation 122 of the CIL Regulations) for determining whether a development consent Section 106 obligation agreement is required is whether the compensation is necessary to make the development acceptable in planning terms. The Applicant has undertaken an EIA to identify the likely significant effects and has proposed mitigation and has also demonstrated through its response to 6.12 to 6.16 in Applicant's Comments on Suffolk County and Babergh Mid Suffolk District Councils' Local Impact Reports [REP3-049], that the NPS does not require projects to mitigate every significant effect. The Applicant considers that the development is already acceptable in planning terms, as the benefits that the project would bring outweigh the small number of localised adverse residual effects that would result. Therefore, the Applicant does not consider that the necessary tests for Section 106 / Regulation 122 are met.

Alternatively, contractual arrangements can be entered into by authorities pursuant to Section 111 of the Local Government Act (LGA) 1972, but for the reasons set out in this answer the Applicant does not consider that to be appropriate.

As requested, examples of where such agreements have been used are:

- Sizewell C (Schedules 11 and 14 of the Deed of Obligation made pursuant to s.111 Local Government Act (LGA) 1972 and s.1 Localism Act 2011); and
- Longfield Solar (Schedule 2 of the Deed of Development Consent Obligations & Other Covenants – Schedule 2 specifically made pursuant to s.111 LGA 1972).

In addition to the above, the Applicant does not consider that it would be appropriate to provide for a landscape restoration fund and a managing officer as part of the DCO. This would be completely disproportionate to the scale of the limited and localised residual effects that are likely to occur on the project. It would also not meet National Grid's duty under the Electricity Act to consumers to be economic and efficient. Any proposed funding mechanism of this nature would not change the outcome of the residual effects to the receptors that experience the effect. Instead, the compensation would be used to increase the benefits elsewhere within the region, which the Applicant considers to be unnecessary given the wider environmental benefits as a result of the project from the removal of the 132kV and parts of the 400kV overhead lines, undergrounding of the 400kV line within Dedham Vale AONB and parts of the Stour Valley and the environmental gain proposed within the Environmental Gain Report [APP-176].

9.2 Visual Assessment

Table 9.2 – Visual Assessment

Reference	Question	Applicant's Response
LV2.9.4	<p>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 CSE 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?</p>	<p>The Applicant can clarify that it is the response on page 129 that is being referred to.</p> <p>Viewpoint G-07 (View from PRoW near Mabb's Corner) is one of the representative viewpoints for Alphamstone Community in the assessment of visual effects on communities (ES Appendix 6.5: Assessment of Visual Effects on Communities [APP-108]). This viewpoint is described and assessed in ES Appendix 6.4: Viewpoint Assessment Section G [APP-106]. During Operation, (in both Year 1 and Year 15), as described in ES Appendix 6.4: Viewpoint Assessment Section G [APP-106], it is anticipated that the magnitude of adverse visual change would be medium-small.</p> <p>Overall, as stated in ES Appendix 6.5: Assessment of Visual Effects on Communities [APP-108], by Year 15, the reinstatement planting associated with the 400kV underground cables at Stour Valley West would be maturing and the landscape would be returning to its existing character. Similarly, the embedded planting around Stour Valley West CSE compound would both screen and visually integrate it into the wider landscape. The adverse effects on the visual amenity of the community area predicted at Year 1 would diminish and the beneficial effects of removing the existing 400kV overhead line would be increasingly experienced. Overall, it is anticipated that the effect on visual amenity would be beneficial and the magnitude of change would be medium-small. Taking account of the high sensitivity, the effect of the project on visual amenity of the Alphamstone community area as a whole at Year 15 of operation would be minor beneficial (not significant).</p> <p>As shown on sheet 28 of LEMP Appendix B: Vegetation Reinstatement Plans [REP3-036], hedgerow mix planting is proposed at Mabb's Corner. This, along with the embedded planting would provide additional screening of the Stour Valley West CSE compound from the lane. The Applicant therefore does not consider that further hedgerow planting along the north-eastern side of the lane between Pebmarsh Road and Mabb's Corner is necessary as views towards the Stour Valley West CSE compound are already screened by the existing hedgerow along the north-eastern edge as well as the intervening properties and vegetation.</p> <p>The Applicant is currently working with the landowner on the proposals for Biodiversity Net Gain which would also help to further screen views during operation although this planting is not required as mitigation.</p>
LV2.9.5	<p>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</p>	<p>The ZTV generated for pylons to be removed was based on top height minus 2.5m. This was so that the comparison was consistent between height of the new pylons and pylons to be removed, as some of the pylons to be removed were 400kV pylons. The Applicant accepts that the notes on ES Figure 6.7: Comparative ZTV of Pylons to be removed and Proposed Pylons [APP-146] do not make this explicitly clear. This figure was produced to show that the extent of theoretical visibility of the removed and proposed pylons was not dissimilar in extent and was not used to directly inform the assessment but only to inform the initial study area and viewpoint locations. The assessment was based on site observations.</p>

Reference	Question	Applicant's Response
	<p>full height of the existing 132kV pylons was used to generate their ZTV, or if it was based on top height minus 2.5m? If the latter, please signpost where this is evidenced in the assessment.</p>	
<p>LV2.9.6</p>	<p>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 underground 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,</p>	<p>The LEMP Appendices including Appendix A: Vegetation Retention and Removal Plan (documents 7.8.1 (B)) and Appendix B: Vegetation Reinstatement Plan (document 7.8.2 (C)) are based on the Proposed Alignment shown on the General Arrangement Plans [APP-018]. This is based on the current designs. However, the detailed design would be undertaken by the Main Works Contractor, when appointed, and therefore could change within the flexibility provided by the Limits of Deviation. The vegetation to be removed and therefore reinstated, could change from that assumed in the LEMP, and the Appendices would need to be updated. Requirements 8, 9 and 10 of the draft DCO [REP6-003] secure this later discharge with the relevant planning authorities in respect of LEMP Appendix A: Vegetation Retention and Removal Plan (document 7.8.1 (B)), LEMP Appendix B: Vegetation Reinstatement Plan (document 7.8.2 (C)) and LEMP Appendix C: Planting Schedules (document 7.8.3 (B)), to provide the relevant planning authorities with details of the vegetation affected and the planting proposals once confirmed.</p> <p>The ES chapters have assessed worst case. Each topic chapter has assessed the impacts of the Proposed Alignment in Sections 6 to 9. Then, as stated in paragraph 5.4.4 of ES Chapter 5: EIA Approach and Method [APP-073], Section 11 of each ES topic chapter covers the sensitivity testing that has been undertaken to identify if there would be any new or different significant effects that may occur through the application of flexibility that is allowed for within the draft DCO [REP6-003] compared to the assessment undertaken in the previous sections to account for any worse effects that could occur.</p> <p>In terms of landscape and visual effects, the flexibility assumptions are set out in paragraphs 6.11.4 to 6.11.5 and Table 6.6 of ES Chapter 6: Landscape and Visual [APP-074]. The assessment has considered pylon locations anywhere within the Limits of Deviation (LoD) and an additional 4m is unlikely to increase the level of effect of a pylon more than 54m in height. The value and susceptibility are constant and would not therefore change. As such, the significance of residual effects would be no different from those outlined in Sections 6.6 to 6.10 of ES Chapter 6: Landscape and Visual [APP-074].</p> <p>Hedgerows and trees are considered in ES Chapter 6: Landscape and Visual [APP-074] as an important part of the landscape character and for the screening they provide. They are also considered in ES Chapter 7: Biodiversity [REP6-009] in terms of their habitat value. Both chapters conclude (in Section 11 of the respective chapters) that there would be no new or different likely significant effects to those identified in Sections 6 to 10 of the respective chapters when taking into account the flexibility provided by the LoD.</p>

Reference	Question	Applicant's Response
	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.	

10.0 Land Use and Soil

10.1 Agriculture and other land use

Table 10.1 – Agriculture and other land use

Reference	Question	Applicant's Response
LU2.10.1	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?	As stated in paragraph 11.6.10 of ES Chapter 11: Agriculture and Soils [APP-079], there would be a temporary disruption to agricultural operations during construction, including as a result of the temporary access route off the A131 to the Stour Valley West CSE compound. The good practice measures set out within the CoCP [REP3-026] would reduce the impacts from this disturbance, in particular the maintenance of access to and from individual land holdings throughout the construction period. Any discussion around effects on the commercial effectiveness of individual land holdings are dealt with through the land agreements and compensation discussions, outside of the planning process.
LU2.10.2	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)?	<p>As stated in paragraph 11.5.7 of ES Chapter 11: Agriculture and Soils [APP-079], the total area inside the Order Limits is approximately 644ha, of which approximately 244ha is mapped as Provisional Grade 2 and approximately 340ha as Provisional Grade 3. Paragraph 11.6.3 states that the assessment assumes that impacts on soils have the potential to occur across all areas within the Order Limits. However, the majority of land required would be reinstated at the end of the construction phase, following the good practice measures set out in the CoCP [REP3-026] and as described within Chapter 11 of the CEMP [REP6-021].</p> <p>As per the response to Written Question LU2.10.7, the assumed temporary footprint associated with topsoil stripping during construction is shown on LEMP Appendix A: Vegetation Retention and Removal Plan (document 7.8.1 (B)). This includes the footprint of the pylon bases, temporary access routes and underground cable working widths and covers approximately 171ha of BMV land, which would be primarily reinstated following construction. The exception would be in locations of the permanent above ground infrastructure. As detailed in Table 11.3 of ES Chapter 11: Agriculture and Soils [APP-079], there would be a total of 1.63 ha of BMV land used permanently for the construction of the four CSE compounds. Paragraph 11.6.15 states that 1.5ha of Grade 3a land would be required for the GSP substation.</p> <p>The permanent land take numbers presented in the ES Chapter exclude the BMV land associated with the pylon bases. This is because the permanent footprint of each pylon base would be small (up to 15x15m as shown on Design and Layout Plans Pylon Designs [APP-028]), and also because in many cases the proposed 400kV pylons would replace the slightly smaller footprint (typically 6x6m) but more numerous existing 132kV pylons, which would balance any loss of BMV land from the new proposed pylons.</p>

Reference Question	Applicant's Response																
LU2.10.3	<p>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?</p>																
<p>Paragraph 11.6.3 of ES Chapter 11: Agriculture and Soils [APP-079] states that the assessment assumes that impacts on soils, and therefore agricultural land, have the potential to occur across all areas within the Order Limits. As detailed in Table 11.3, there would be a total of 1.63 ha of BMV land used permanently for the construction of the four CSE compounds. Paragraph 11.6.15 states that 1.5ha of Grade 3a land would be required for the GSP substation. All other areas could potentially be disturbed temporarily.</p>	<p>The areas of affected land in agri-environmental, forestry and woodland grant schemes are as per the table below.</p>																
<table border="1"> <thead> <tr> <th data-bbox="797 478 1469 598">Category</th> <th data-bbox="1469 478 1736 598">Agri-environmental Schemes</th> <th data-bbox="1736 478 1912 598">Forestry Schemes</th> <th data-bbox="1912 478 2130 598">Woodland Grant Schemes</th> </tr> </thead> <tbody> <tr> <td data-bbox="797 598 1469 654">Total area inside the Order Limits</td> <td data-bbox="1469 598 1736 654">159.3ha</td> <td data-bbox="1736 598 1912 654">6.4ha</td> <td data-bbox="1912 598 2130 654">5.2ha</td> </tr> <tr> <td data-bbox="797 654 1469 805">Total area inside the Order Limits that would be subject to topsoil stripping as shown on LEMP Appendix A: Vegetation Removal Plan (document 7.8.1 (C))</td> <td data-bbox="1469 654 1736 805">58.1ha</td> <td data-bbox="1736 654 1912 805">0.2ha</td> <td data-bbox="1912 654 2130 805">0.1ha</td> </tr> <tr> <td data-bbox="797 805 1469 925">Area inside the Order Limits that would contain permanent above ground features (i.e. the CSE compounds and GSP substation).</td> <td data-bbox="1469 805 1736 925">1.4ha</td> <td data-bbox="1736 805 1912 925">0ha</td> <td data-bbox="1912 805 2130 925">0ha</td> </tr> </tbody> </table>	Category	Agri-environmental Schemes	Forestry Schemes	Woodland Grant Schemes	Total area inside the Order Limits	159.3ha	6.4ha	5.2ha	Total area inside the Order Limits that would be subject to topsoil stripping as shown on LEMP Appendix A: Vegetation Removal Plan (document 7.8.1 (C))	58.1ha	0.2ha	0.1ha	Area inside the Order Limits that would contain permanent above ground features (i.e. the CSE compounds and GSP substation).	1.4ha	0ha	0ha	<p>As noted in the response to ExQ1 CM1.5.53 [REP3-052], the Sustainability Action Plan is a document produced by the different contractors tendering for the work. It is therefore a commercially sensitive document that is used as part of the tendering assessment to select an approved contractor. The Applicant does not consider there to be a need to include references to tender documents within the Materials and Waste Management Plan (MWMP) [REP3-032]. All measures pertaining to reduction of raw materials and waste are contained within the MWMP [REP3-032].</p>
Category	Agri-environmental Schemes	Forestry Schemes	Woodland Grant Schemes														
Total area inside the Order Limits	159.3ha	6.4ha	5.2ha														
Total area inside the Order Limits that would be subject to topsoil stripping as shown on LEMP Appendix A: Vegetation Removal Plan (document 7.8.1 (C))	58.1ha	0.2ha	0.1ha														
Area inside the Order Limits that would contain permanent above ground features (i.e. the CSE compounds and GSP substation).	1.4ha	0ha	0ha														
LU2.10.4	<p>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?</p>																
LU2.10.5	<p>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</p>																
<p>Articles 26 and 27 of the draft DCO [REP6-003] require the Applicant and UKPN (respectively) to remove all temporary works and restore any land possessed temporarily to the reasonable satisfaction of the owners of the land. This position is reflected in the voluntary agreements where any damage caused by the exercise of the rights is to be made good. This is to be at the reasonable satisfaction of the Grantor.</p>	<p>In terms of 're-establishment', as the principle behind reinstatement is equivalence to establish the original condition of the land, it would be necessary to carry out a record of condition prior to construction (as per good practice GG06 in the CoCP [REP3-026] and in accordance with the provisions of the voluntary agreement). The</p>																

Reference Question	Applicant's Response	
<p>this aftercare period is secured in the dDCO?</p>	<p>re-instatement of soil horizons would be undertaken as part of the construction period. Paragraph 11.3.41 of the CEMP [REP6-021] 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. The soil would be reinstated as soon as practicable after the main construction works have been completed, subject to weather conditions for example if the soil was waterlogged or frozen.</p> <p>Reinstatement would be a collaborative process between the Applicant and affected landowner, and with grassland, subject to agreement, would most likely involve sowing an appropriate seed mix across the applicable area, as per Section 8.6 of the LEMP (document 7.8 (C)). As noted in paragraph 8.6.1 of the LEMP (document 7.8 (C)) seed would be applied at a suitable time of year (e.g. autumn or spring) but can be sown at the other times of the year if there is sufficient warmth and moisture. The seasonal and weather constraints, together with landowner aspirations, mean that there may be a period of time between the completion of the main construction works before grass seeds can be sown. Once sown, it typically takes between four and six weeks for a grass sward to establish, at which point the grassland would be handed back to the landowner, subject to their reasonable satisfaction as per Articles 26 and 27 of the draft DCO [REP6-003]. During other seasons or extreme weather conditions, such as cold weather, flooding or drought, it may take longer or there may be a hiatus between construction being completed and sowing/establishing the sward and handing back to the landowner.</p> <p>The reinstatement proposals and the aftercare period are detailed within the LEMP (document 7.8 (C)), which is secured through Requirement 4 of the draft DCO [REP6-003].</p>	
<p>LU2.10.6</p>	<p>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?</p>	<p>High level options appraisal work, such as that undertaken during the route selection, uses the Department for Environment, Food and Rural Affairs (Defra) Agricultural Land Classification (ALC) mapping layer to identify Best and Most Versatile (BMV) land. As this layer does not differentiate between 3a and 3b, a precautionary assumption that all Grade 3 is BMV land was made however. Using this data source, the four route corridors considered in the Route Corridor Study (October 2009) [REP3-015] would all lie wholly within BMV land, except for an area at and around Hintlesham Woods SSSI and to the south of Ansell's Grove (where a trenchless crossing is proposed to avoid habitats). Therefore, BMV land was not a material differentiating factor between the options (including the locations for structures) compared with other factors such as application of the Holford Rules and proximity to nationally designated sites as discussed in the Planning Statement [REP6-011].</p>

10.2 Soils Geology and Ground Conditions

Table 10.2 – Soils Geology and Ground Conditions

Reference	Question	Applicant's Response
LU2.10.7	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.	<p>The 644ha value referred to in the response to ExQ1 LU1.10.22 [REP3-052] is the total area (ha) within the Order Limits, which was used as a worst case for the purposes of the assessment in ES Chapter 11: Agriculture and Soils [APP-079] to quantify the maximum soil that could be affected by the project. The assessment assumed topsoil stripping in the locations/activities listed in paragraph 11.4.19 of ES Chapter 11: Agriculture and Soils [APP-079], which typically assumed an 80m working width in the underground cable sections and the base of the pylons and the temporary access routes in the overhead line section.</p> <p>The Applicant cannot confirm the total area of topsoil strip until after a Main Works Contractor has been appointed and has undertaken the detailed designs. However, the assumed topsoil stripping associated with the construction of the Proposed Alignment is shown on LEMP Appendix A: Vegetation Retention and Removal Plan (document 7.8.1 (B)). This is considered to be a reasonable assumption based on knowledge of similar projects and covers approximately 171ha, approximately one quarter of the area inside of the Order Limits.</p>
LU2.10.8	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?	<p>The measures to plan manage and monitor excavated soil are set out in Chapter 11 of the CEMP [REP6-021], which is a controlled document secured through Requirement 4 of the draft DCO [REP6-003]. Measures around the planning of soil excavation are set out in paragraphs 11.3.2 to 11.3.5 (scheduling works) and paragraphs 11.3.6 to 11.3.11 (undertaking soil surveys and planning where to store the soil during construction). Soil management measures are set out in paragraphs 11.3.12 to 11.3.20 (management of soil stripping) and paragraphs 11.3.21 to 11.3.33 (management of stockpiles). Table 15.1 of the CEMP [REP6-021] sets out the monitoring that would be undertaken in relation to soils, which would include visual inspections of stockpiles.</p>
LU2.10.10	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?	<p>As per paragraph 11.3.41 of the CEMP [REP6-021], the Main Works Contractor, as part of the construction phase, and through either the DCO or voluntary agreement, would be able to utilise the Applicant's rights to the land. During this time period it is anticipated that there would be a point when the soil characteristics required to achieve the reinstatement standard are achieved. The aftercare period would only commence after soil characteristics required to achieve the reinstatement standard have been achieved. The aftercare period would vary, subject to the extent of the damage and the pre-construction land use. For example, fallow land or land that was previously cropped would be returned to the landowner as soon as soil conditions have been achieved and the landowner is reasonably satisfied. Pasture and amenity grassland would be handed over once a grass sward has been established (see the Applicant's response to ExQ LU2.10.5), and the landowner has confirmed reasonable satisfaction. Hedgerows, woodland and other habitats would be subject to the aftercare periods outlined in the LEMP (document 7.8 (C)).</p>

11.0 Noise and Vibration

Table 11.0 – Noise and Vibration

Reference	Question	Applicant's Response
NV2.11.1	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?	<p>The construction noise and vibration assessment presented in the ES Chapter 14: Noise and Vibration [APP-082] supported by ES Appendix 14.1: Construction Noise and Vibration Data [APP-136], assumed percussive piling may be used for the construction of pylon foundations as a worst case as this is considered to be the noisiest activity.</p> <p>The Main Works Contractor would determine the pylon foundation construction method on a case-by-case basis, taking account of ground conditions. In practice, an excavated pad foundation or other method would be used where ground conditions allow. Alternative method would generate less noise than a percussive piling method and are typically not a material source of vibration. As such, the use of different piling options and techniques have not been directly assessed in the ES, as the noise and vibration impacts would be lower than the worst-case results presented for percussive piling.</p>
NV2.11.2	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?	Best practicable means would be determined by the Main Works Contractor following the confirmation of the methods proposed at each location and would include consideration of potential local noise sensitive receptors/locations. Where applicable, this could include measures such as the use of acoustic barriers (for example), examples of noise mitigation and best practicable means are provided in Chapter 14 of the CEMP [REP6-021].
NV2.11.4	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.)	The Applicant can confirm that the contractor's detailed construction noise and vibration assessment would be undertaken by a suitably qualified noise and vibration specialist. This will be added to the CEMP at Deadline 8.
NV2.11.5	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	As stated in paragraph 14.4.11 of the CEMP [REP6-021], in the event that planned works not covered by a consent (either full Section 61 application or dispensation/variation) extend beyond the approved working hours and continue due to unforeseen circumstances that would affect safety or engineering practicability, the relevant planning authority would be kept informed of the nature, time, location and reasons for the overrun as soon as possible, and records kept by the site management.

Reference	Question	Applicant's Response
	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 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?	The LOAEL was set at 50 dBA during daytime periods ((07:00 – 23:00), based on the guidance of 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS 8233), and 40 dBA during night-time periods (23:00 – 07:00), based on the guidance of the World Health Organisation Night Noise Guidelines for Europe, 2009 (NNG). These levels are applied to any activities occurring in these times.
NV2.11.7	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?	Table 3.1 of ES Appendix 14.2 Construction Traffic Noise and Vibration Assessment [APP-137] relates to construction traffic movements on temporary access routes. Activities such as a dump truck reversing and tipping material would be considered as part of wider construction activity, as presented in ES Appendix 14.1 Construction Noise and Vibration Data [APP-136].
NV2.11.8	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	Generally, construction activities comprise a range of different noise sources with different characteristics, and the impacts at receptors arise from the combined noise of all activities taking place. The majority of these sources are adequately controlled by setting an appropriate steady noise level limit. Disturbance from impulsive noise sources, such as percussive piling, can be higher due to the nature of these sounds. Noise monitoring would not be used as standard, but where impulsive noise sources require noise monitoring as part of their management, a noise

Reference	Question	Applicant's Response
	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?	<p>limit value in terms of average $L_{Aeq,T}$ levels may not be appropriate and an alternative criteria could be applied. Where applicable, specific noise level criteria would be discussed and agreed with the local authority and may be secured through the Section 61 process.</p> <p>Community liaison is an important factor in letting people near construction works understand the types of noise that may be generated, which can reduce the risk of noise concerns. Community liaison would be undertaken in accordance with good practice measure GG25, as detailed in the Section 3.4 of the CEMP [REP6-021].</p>
NV2.11.9	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?	<p>There is no particular method for assessing maximum noise levels from construction works during night-time periods, with the BS 5228 assessment methodology using average $L_{Aeq,T}$ noise levels as assessment criteria.</p> <p>It is noted that the World Health Organisation Guidelines for Community Noise, 1999 state that for a good sleep, indoor sound pressure levels should not exceed approximately 45 dB $L_{AF,max}$ more than 10-15 times per night, with a recommended external guideline value of 60 dB $L_{AF,max}$ outside bedrooms. Based on experience from similar projects, maximum noise levels from most construction activities would be less than 15dB above steady L_{Aeq} levels, and the SOAEL value of 45 dB $L_{Aeq,8h}$ externally also captures maximum noise events. Particularly impulsive activities, such as piling, would not be carried out at night.</p>
NV2.11.10	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?	<p>Noise and vibration from all construction activities would be managed in accordance with the Construction Environment Management Plan [APP-177], requiring the use of best practicable means to reduce noise and vibration levels. Best practicable means to reduce noise and vibration levels would apply to all works, including those exceeding the NOEL, through standard construction practices. However, specific measures are not proposed where noise levels are below the LOAEL.</p>
NV2.11.11	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?	<p>An assessment of likely impacts from noise from the construction phase is provided in ES Chapter 14 Noise and Vibration [APP-082], based on the guidance of BS 5228-1 and DMRB LA 111. There is no specific assessment methodology or criteria for construction activities with distinctive characteristics. However, it is widely accepted that some construction activities, such as percussive piling, have characteristics such as impulsivity that may make the noise more disturbing. Best practicable means (BPM) to reduce noise would be applied to reduce noise impacts, and this would include the use of alternative methods. As such, activities such as percussive piling would only be used where there are no practicable alternatives (e.g. due to ground conditions), although this has been assumed as a worst case within the ES. With BPM used, significant adverse effects would be expected to be avoided.</p> <p>With regards to health and wellbeing, the assessment criteria have been framed around the wording of the Noise Policy Statement for England, and the Planning Practice Guidance for Noise (PPGN) (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, 2014). The latter references a noise exposure hierarchy which provides the likely average response to noise of those affected. With BPM in place to reduce noise levels, the impact of construction noise is expected to be above the LOAEL, but</p>

Reference	Question	Applicant's Response
		<p>below the SOAEL at the worst case affected properties. The PPGN guidance indicates that at this effect level noise may be present and intrusive, and 'can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life.'</p>
NV2.11.12	<p>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?</p>	<p>The response to ExQ1 LU1.10.24 [REP3-052] states that there is potential for piling or drilling into rock. The assessment has considered the potential for percussive piling without specific mitigation measures as a worst case, and noise levels from drilling would be lower. In practice, activities such as percussive piling would only be used where ground conditions require it and best practicable means would be applied to reduce noise levels.</p>
NV2.11.13	<p>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?</p>	<p>The assessment considered; the deliveries of aggregates to site, from the data provided in ES Appendix 14.2 Construction Traffic Noise and Vibration Assessment [APP-137]; the lifting of aggregates by an excavator into a dumper; and the movement of aggregates on site from the data provided in ES Appendix 14.1 Construction Noise and Vibration Data [APP-136]. The assessment did not include the dumping of aggregates from the 20T tipper lorries. The calculations have been reviewed to consider this activity and there is a negligible change in activity noise level (0.1dB) and no additional adverse impacts.</p>
NV2.11.14	<p>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?</p>	<p>The Construction Traffic Management Plan [REP6-025] includes for precondition surveys of access points and the local road network affected by construction activities. This is secured through good practice measure GG06 of the Code of Construction Practice [REP3-026]. Additionally, the regular inspection and repair of the temporary access routes and bellmouths is secured through measure GG27. The maximum speed limit would be 15mph on surfaced and 10mph on unsurfaced temporary access routes. Construction vehicles would also adhere to speed limits on the local road network. The Applicant considers that defects on the local road network would be the responsibility of the relevant highway authority, as this would affect vibration levels from all traffic, not just that relating to the project. Overall, significant adverse effects from vibration are not expected where the road is well maintained and free from defects.</p>

Reference	Question	Applicant's Response
NV2.11.15	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 (CSE) compounds would not generate noise. Can you clarify if this means that these features would emit no noise, i.e., 0 dB(A)?	Cable sealing end compounds are the transition between the overhead lines and underground cables. Any noise is therefore generated by the same mechanism as overhead lines and are assessed accordingly. There are, however, no other sources of operational noise associated with CSE compounds. With regards to underground cables, there is no mechanism by which noise can be generated.
NV2.11.16	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?	<p>The noise thresholds (Category A) in Section E.3.2 of BS 5228-1 are the SOAEL for daytime (65dBA), evenings and weekends (55dBA), and night-time (45dBA). Category A values have been used as a worst-case given the relatively quiet, rural nature of the project area. In noisier areas, such as near main roads, a higher threshold (Category B or C) may apply, and the use of the Category A threshold would overestimate impacts as a worst-case in these instances.</p> <p>Where construction noise levels exceed the Category A values for the respective period at a sensitive receptor, this would exceed the SOAEL and would lead to a significant effect if they occur for a duration exceeding the temporal thresholds of at least 10 days in any 15 consecutive days, or 40 days in any consecutive six months.</p>
NV2.11.17	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]?	<p>The time periods for the different significance thresholds are defined in Section E.3.2 BS 5228-1 and the Design Manual for Roads and Bridges LA 111 Noise and Vibration. The assessment of noise impacts use the criteria for the respective periods in which the activity occurs.</p> <p>If daytime works were expected to start at 06:00 the SOAEL would be 45dB for the first hour and 65dB for the second hour. As Saturday works start at 08:00 the SOAEL is 65dB.</p>
NV2.11.18	Can you explain with evidence how a daytime construction noise level of 50 dB $L_{Aeq,10h}$ translates to LOAEL?	<p>The Noise Policy Statement for England (Defra, 2010) (NPSE) sets out the principles of the Government's policy on noise, and establishes the concept of the lowest observed adverse effect level (LOAEL) and significance adverse effect level (SOAEL). However, the NPSE does not define LOAELs or SOAELs for specific contexts, but indicates that these may be defined by applicable guidance.</p> <p>The LOAEL is defined in the Planning Practice Guidance for Noise (PPGN) (DLUHC and MHCLG, 2019). This includes a noise exposure hierarchy which provides the likely average response to noise of those affected and defines noise levels above the LOAEL as noise that may be present and intrusive, stating '<i>noise can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the character of the area such that</i></p>

Reference	Question	Applicant's Response
		<p><i>there is a small actual or perceived change in the quality of life.'</i> The action for noise levels exceeding the LOAEL is to mitigate and reduce to a minimum.</p> <p>The LOAEL values applied to the assessment of construction noise were derived from British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS 8233), which provides, amongst other things, guidance for suitable acoustic conditions in bedrooms, living rooms and external amenity spaces.</p> <p>BS 8223 provides an upper guideline value for 'desirable' internal noise levels of 35 dB $L_{Aeq,16h}$ for living rooms and bedrooms during daytime periods. BS 8233 goes on to state that if partially open windows were relied upon for background ventilation, the insulation would be reduced to approximately 15 dB. An external noise level of 50 dB $L_{Aeq,10h}$ would therefore be reduced to 35 dB $L_{Aeq,10h}$ through a partially open window. Internal noise levels would be lower with closed windows. BS 8233 notes that 'reasonable' internal conditions may be achieved up to 40 $L_{Aeq,16h}$ for living rooms and bedrooms during daytime periods.</p> <p>BS 8223 also noted that guidance values are based on annual average data and do not have to be achieved in all circumstances.</p> <p>Additionally, BS 8233 states that for traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB $L_{Aeq,T}$ with an upper guideline value of 55 dB $L_{Aeq,T}$ which would be acceptable in noisier environments.</p> <p>Exceedance of the values stated in BS 8223 are therefore considered to represent the LOAEL as defined by the definition provided by PPGN (with 'desirable' levels considered as a worst case).</p>
NV2.11.19	Can you confirm the LOAEL for construction noise at night-time?	<p>Further to the answer provided in response to Written Question NV2.11.18, the LOAEL is defined in the PPGN (DLUHC and MHCLG, 2019). The LOAEL values for construction noise at night were derived from guidance values provided by the World Health Organisation (WHO) Night Noise Guidelines for Europe, 2009. This explicitly states 40 dB $L_{night,outside}$ as the LOAEL. The values stated in the WHO Night Noise Guidelines are considered to represent the LOAEL as defined by the definition provided by PPGN, as a worst-case.</p>
NV2.11.20	Can you clarify if the assessment considered the effects of construction noise (above NOEL to LOAEL, and above LOAEL) on health and well-being?	<p>The NPSE sets out the principles of the Government's policy on noise, and establishes the concept of the no observed effect level (NOEL), the LOAEL, and SOAEL. However, the NPSE does not define NOELs, LOAELs or SOAELs for specific contexts, but indicates that these may be defined by applicable guidance.</p> <p>The NOEL, NOAEL (no observed adverse effect level) and LOAEL are defined in the PPGN (DLUHC and MHCLG, 2019). This includes a noise exposure hierarchy which provides the likely average response to noise of those affected.</p> <p>The PPGN defines noise levels above the NOEL as having '<i>no effect</i>', with no specific measures required as an action at this level.</p> <p>The PPGN defines noise levels above the NOAEL as being present and not intrusive, stating '<i>noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the</i></p>

Reference	Question	Applicant's Response
		<p><i>acoustic character of the area but not such that there is a change in the quality of life', with no specific measures required as an action at this level.</i></p> <p>The PPGN defines noise levels above the LOAEL as noise that may be present and intrusive, stating '<i>noise can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the character of the area such that there is a small actual or perceived change in the quality of life.</i>' The action for noise levels exceeding the LOAEL is to mitigate and reduce to a minimum.</p> <p>The main purpose of the construction noise assessment was to identify sensitive locations which may experience significant adverse effects without specific mitigation (i.e. 'hot-spots' with noise exceeding the SOAEL for a significant duration). Specific consideration of mitigation measures at those locations are secured through the CEMP [REP6-021] and Requirement 4 of the draft DCO [REP6-003].</p> <p>In addition, the assessment predicts noise levels from construction activities and identifies locations where LOAEL would be exceeded, without mitigation. Although these effects would not be significant, BPM would be used to reduce noise and vibration levels as secured through good practice measure NV01 of the CoCP [REP3-026] and the CEMP [REP6-021]. The avoidance of significant impacts and reduction of levels reduces the impacts on health and wellbeing.</p>
NV2.11.21	<p>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:</p> <ul style="list-style-type: none"> i) the positioning of lines to help mitigate noise; ii) appropriately sized conductor arrangement used to minimise potential noise; iii) quality assurance through manufacturing and transportation; iv) cleanliness of conductors during stringing and installation. 	<p>Operational noise from overhead lines was scoped out of the assessment as the proposed overhead line is a low noise triple-araucaria conductor, as described in the Environmental Impact Assessment Scoping Report [APP-156] and agreed in the Scoping Opinion [APP-159]. ES Appendix 14.3 Overhead Line Noise Assessment [APP-138] provides information as evidence to justify scoping out operational noise.</p> <ul style="list-style-type: none"> i) The Appendix does not provide comment on the positioning of the overhead line. However, details of how the route alignment has avoided settlements and built-up areas is provided in ES Chapter 3: Alternative Considered [APP-071]. ii) The Appendix provides comment on the appropriately sized conductor arrangement used to reduce noise. iii) The Appendix does not provide comment on quality assurance through manufacturing and transportation. However, these would be secured through National Grid's quality standards; and iv) The Appendix does not provide comment on cleanliness of conductors during stringing and installation. However, these would be secured through National Grid's quality standards.
NV2.11.22	Paragraph 2.9.13 of the National Policy Statement for Electricity Networks	Details of maintenance arrangements are provided in ES Chapter 4: Project Description [APP-072]. Noise effects from maintenance activities are discussed in paragraph 14.3.10 of ES Chapter 14: Noise and Vibration [APP-082].

Reference	Question	Applicant's Response
	<p>Infrastructure (NPS EN-5) states the ES should include information on planned maintenance arrangements. Can you signpost the relevant sections in the ES?</p>	
NV2.11.23	<p>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.</p>	<p>Defra strategic noise map data is shown in Figure 14.1: Noise Baseline [APP-155]. The figure shows areas where the Defra data indicates that daytime noise levels would exceed 55 dB L_{Aeq,16h}. The figure also shows locations of Noise Important Areas (NIA), which represent the noisiest 1% of locations in England due to road and rail sources (the noise level in these areas would be expected to exceed approximately 65 dB L_{Aeq,16h}).</p> <p>The noise survey data referenced in 14.4.11 of ES Chapter 14: Noise and Vibration [APP-082] relates to a survey conducted in 2012 for scoping of operational substation noise prior to the project pause. Detailed noise surveys were also undertaken in 2021 to inform the operational grid supply point substation noise assessment as part of this project, as detailed in ES Appendix 14.4: Grid Supply Point Substation Noise Assessment [APP-139].</p> <p>The survey data indicates that background noise levels were typically unaffected by transport infrastructure, resulting in relatively low measured noise levels.</p>
NV2.11.24	<p>At Deadline 6, the Applicant submitted its Document 8.8.7, Technical Note for Noise Sensitive Receptors. 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> <p>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?</p> <p>2. Can you update your position on this</p>	<p>1. All construction activities were included in the assessment and intra-project cumulative effects were considered. However, construction traffic on the local road network was not included. This is because there is no distinction between weekday and weekend periods in the construction traffic noise assessment criteria.</p> <p>2. The Applicant is awaiting feedback from the local authorities on the noise sensitive receptors identified to be considered for additional measures. If no response is received, the Applicant will proceed based on the list of receptors identified through assessment and will secure these measures through the CEMP at a future deadline.</p> <p>3. The Applicant is content that the types of noise mitigation measures that have already been identified for the NSRs identified in the ES could also be applied to the newly identified NSR such that any adverse noise effects could be satisfactorily reduced.</p> <p>4. The Applicant would propose adding the additional NSR and commitment wording to Chapter 14 of the CEMP [REP6-021], which is secured through Requirement 4 of the draft DCO [REP6-003].</p>

Reference	Question	Applicant's Response
	<p>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.</p> <p>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?</p> <p>4. Could the Applicant detail how any necessary additional mitigation measures will be secured?</p>	

12.0 The Water Environment

12.1 Flood Risk Assessment

Table 12.1 – Flood Risk Assessment

Reference	Question	Applicant's Response
WE2.12.1	Paragraph 5.7.2 of Overarching National Policy Statement for Energy (NPS EN-1) states, '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'. 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?	<p>Evidence in support of the satisfaction of elements one and two of paragraph 5.7.16 of NPS EN-1 are provided in Section 1 of ES Chapter 1: Introduction [APP-069] and Sections 3.3 to 3.10 of ES Chapter 3: Alternatives Considered [APP-071].</p> <p>No permanent infrastructure would be located in Flood Zone 3. The grid supply point (GSP) substation and cable sealing end (CSE) compounds, which represent the parts of the project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. W14 in the CoCP [REP3-026] states that pylons will be located outside of Flood Zones 2 and 3. Where, by exception, this is not practicable pylons would be positioned in accordance with the conditions of a Flood Risk Activity Permit from the Environment Agency. These permits would attach conditions so that any works within Flood Zone 3 would be safe, without increasing flood risk elsewhere, addressing the third element of paragraph 5.7.16 of NPS EN-1.</p> <p>For the construction phase, only limited works would be undertaken in Flood Zone 3, specifically the temporary works for the trenchless crossing and the temporary access route associated with the crossings of the River Stour and River Box. Given the temporary nature of these activities and the embedded/good practice measures described in the Flood Risk Assessment [APP-059], the residual flood risk during construction would be very low.</p> <p>The Environment Agency Written Representation [REP2-023] states that it has no outstanding Flood Risk concerns, and this is further confirmed in the Statement of Common Ground The Environment Agency [REP6-019].</p>

12.2 Surface Water Management

Table 12.2 – Surface Water Management

Reference	Question	Applicant's Response
WE2.12.2	Can you confirm whether the proposed drainage systems for the Proposed	Drainage systems for the proposed development would be developed at detailed design stage, in accordance with appropriate standards and guidance. Good practise measure W12 from CEMP Appendix A: CoCP [REP3-026]

Reference	Question	Applicant's Response
	Development comply with any national standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010?	<p>states that <i>'Where new, permanent areas of impermeable land cover are created, the drainage design will be in accordance with the requirements of the Essex County Council Sustainable Drainage System (SuDS) Design Guide (2020) and the Suffolk County Council SuDS Palette (2021) and will include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. The drainage infrastructure will provide the storage necessary to achieve discharges at greenfield rates and will not significantly alter groundwater recharge patterns by transferring a significant recharge quantity from one catchment to another. A specialised drainage contractor will review the designs and will provide advice to National Grid and its contractor during relevant construction and reinstatement activities'</i>.</p> <p>Essex County Council Sustainable Drainage System (SuDS) Design Guide (2020) and the Suffolk County Council SuDS Palette (2021) are derived from the CIRIA SuDS manual to complement national requirements and guidance, whilst reflecting the local environment. Compliance with these guides will therefore ensure national standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010 are applied where relevant, including; the SuDS Manual (CIRIA, 2015) and the Non-Statutory Technical Standards for Sustainable Drainage Systems (Defra, 2015).</p>

12.3 Management Measures

Table 12.3 – Management Measures

Reference	Question	Applicant's Response
WE2.12.3	The Environment Agency [REP3-070] states in its response to ExQ1 WE1.12.12: '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	<p>It is not expected that works associated with river crossings would impact on abstractions or water supplies, as wherever the flow of a watercourse might be interrupted by temporary damming, the works would be over pumped to maintain downstream flows. It is not anticipated that these trenchless crossings works would impact on the supply of groundwater, however good practice measure W09 in the CoCP [REP3-026] would maintain any private supplies:</p> <p><i>'Active private water supplies will be identified with landowners through the landowner discussions. Appropriate measures will be considered during construction. In the event of a landowner or tenant reporting that installation activities have affected their private water supplies, an initial response will be provided within 24 hours. Where the installation works have affected a private water supply, an alternative water supply will be provided'</i>.</p> <p>The response to question WE1.12.18 in the Applicant's Responses to First Written Questions (document 8.5.4), details how effects on surface water quality will be avoided during construction. Chapter 10 of the CEMP (document 7.5 (C)), explains the measures that would be undertaken to avoid effects on groundwater when dewatering to ground is carried out, for example by using settlement tanks and undertaking visual monitoring.</p>

Reference	Question	Applicant's Response
	<p>are affected but should be clarified with the applicant'.</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>	<p>These measures would ensure there is no interruption to abstractions due to the construction of the trenchless crossings. Water required for the trenchless crossings would be brought to site by tanker, as detailed in paragraph 9.3.10 of the CEMP [REP6-021].</p>
WE2.12.5	<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>	<p>The Applicant has amended the wording directly within the management plans in response to the Environment Agency's comments. Paragraph 9.3.27 of the CEMP [REP6-021] references the incident hotline in relation to pollution events and paragraph 6.5.7 of the MWMP [REP3-032] references an appropriately licensed waste carrier in relation to wastewater generated. As this wording is already secured within the management plan, the Applicant does not consider there to be a need to also amend the wording in the CoCP.</p>
WE2.12.6	<p>In its response to ExQ1 WE1.12.15 (dewatering activities), the Environment Agency [REP3-070] notes that, 'These partially satisfy Regulation 5 of the Water Abstraction and Impoundment (Exemptions) Regulations 2017... but should also consider the other requirements.' Has Chapter 4 of the ES [APP-072] been updated to reflect this observation?</p>	<p>ES Chapter 4: Project Description [APP-072] presents the description of the project as it was at the time of the environmental assessment for application. The statement by the Environment Agency does not change the assessment within the ES, and therefore the Applicant does not consider there to be a need to update ES Chapter 4: Project Description [APP-072] to reflect the observation.</p>
WE2.12.7	<p>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?</p>	<p>As part of the assessment undertaken within ES Chapter 10 Geology and Hydrogeology [APP-078], a Groundwater Risk Assessment was included within Section 3 of ES Appendix 10.2: Groundwater Baseline and Assessment [APP-131]. This assessed the potential risks during construction and operation, to groundwater and groundwater receptors within 500m of the Order Limits, in relation to potential dewatering. In areas where overhead line is proposed, the assessment concluded that due to the small overall footprint of the pylon bases,</p>

Reference	Question	Applicant's Response
		<p>dewatering would not be anticipated. In areas of opencut (for underground cables), the assessment concluded that groundwater levels are expected to be below the base of the opencut trenches and therefore dewatering would not be anticipated.</p> <p>At the locations of the four trenchless crossings proposed, the assessment concluded that, based on ground investigation information, groundwater is unlikely to be intercepted by the launch/receptor pits of the trenchless crossings to the west of the Sudbury Branch Railway Line, the east of the River Stour and at the western end of Ansell's Grove, therefore dewatering is unlikely to be required at these locations. However, the Groundwater Risk Assessment [APP-131] identified that groundwater could be intercepted by the launch/receptor pits of the trenchless crossings between the River Stour and Sudbury Railway Line crossing, the eastern end of the Ansell's Grove crossing and at the River Box crossing, and that dewatering may be required at these locations.</p> <p>In accordance with commitments GG01 and W01 within the CEMP Appendix A: CoCP [REP3-026], the project will be delivered and operated in compliance with all relevant legislation, consents and permits.</p> <p>Confirmation of the method and design would only be available once a Main Works Contractor is appointed, therefore there is no further design information available at this stage to suggest that the assumption used within the ES would be different to that assessed.</p>

12.4 Temporary Bridges and Culverts

Table 12.4 – Temporary Bridges and Culverts

Reference	Question	Applicant's Response
WE2.12.9	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?	<p>The Applicant intends to remove all temporary culverts at the end of construction, for example those associated with the temporary access routes. As shown in Table B1 in the Water Framework Directive (WFD) Assessment [REP1-009], there is one culvert that would remain post construction (W-H-8). This is for the permanent access route at the grid supply point (GSP) substation and would involve culverting of up to 10m of a ditch/minor watercourse. The assessment presented in the WFD Assessment [REP1-009] concludes that the residual effects of the project on waterbodies would be negligible and that the project is compliant with the objectives of the WFD. Therefore, no additional measures are required to mitigate or compensate for the likely net loss of wetland habitats.</p>

13.0 Traffic and Transport

13.1 Transport Assessment

Table 13.1 – Transport Assessment

Reference	Question	Applicant's Response
TT2.13.1	<p>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:</p> <ol style="list-style-type: none"> 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%ile speed. 	<p>The Applicant has submitted the Transport Assessment Traffic Survey Data (document 8.9.6) at Deadline 7 which contains the list of requested information.</p> <p>For all sites:</p> <ul style="list-style-type: none"> • Regarding Item 2, the purpose for all sites was to provide information to prepare the Transport Assessment. • Regarding Item 4, the programmed duration of data collection at each site was 14 days, and data for each site are contained in two files each covering a seven-day 24-hour period (i.e. week 1 and week 2 for each site). For a few sites, a longer survey was undertaken, and in a few locations one week of data is available, as explained in Transport Assessment Traffic Survey Data (document 8.9.6). • Regarding Item 6, the 14 classification categories for all count sites are set out in Transport Assessment Traffic Survey Data (document 8.9.6). • The data for items 1,3,5 and 7 for each site are tabulated in Appendix A of Transport Assessment Traffic Survey Data (document 8.9.6).
TT2.13.2	<p>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%?</p>	<p>The referenced 12.5% factor was included as an overall uplift in the calculation of construction vehicle requirements based on technical judgement and knowledge of other projects specifically to make some allowance for fluctuations in vehicle volumes at different times.</p> <p>The Applicant also notes that significant contingency has been included during other stages of the process of estimating construction vehicle requirements. For example, the maximum monthly construction vehicle requirement at each access point in a seven-month period around the identified August 2025 peak has been used</p>

Reference	Question	Applicant's Response
		<p>in the assessment. This has the effect of inflating the total number of construction vehicles assessed across the project by over 40% when compared with the combined August 2025 requirement.</p>
TT2.13.3	<p>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?</p>	<p>The referenced 5% threshold was used to identify roads where the project could have a material impact on baseline road safety issues. Using a 5% change in baseline traffic flow as the threshold for identifying potential material impacts is standard practice and commonplace in the development of transport assessments. Consequently, on roads below this threshold, it was assumed that the project would not have a material impact on baseline road safety issues, and it was therefore not considered necessary to examine personal injury and collision data for vulnerable road user groups on those roads during the development of the Transport Assessment [APP-061].</p> <p>However, while it is unnecessary and would have been disproportionate for the purpose of developing the Transport Assessment [APP-061], a more detailed review of collision data would be carried out for the purpose of developing detailed designs for temporary access points required by the project. The collision data would also form part of the Road Safety Audit Brief covering evaluation of amendments to the road network required by the project (for example the introduction of temporary vehicle access points). This is secured by Requirement 11(3) of the draft DCO [REP6-003] and would include reviewing data for vulnerable road user groups such as walkers, cyclists and horse riders.</p>
TT2.13.4	<p>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?</p>	<p>ES Chapter 15: Cumulative Effects Assessment [APP-083] considered the intra-project cumulative effects of the project on the public transport network. The screening matrix in Table 3.1 of ES Appendix 15.2: Intra project Cumulative Effects Matrix [APP-141] includes the sensitive receptor category 'vehicle users', which included bus users. The assessment states that vehicle users may be affected by an increase in traffic during construction (construction vehicles and staff commuting), and temporary road closures. ES Appendix 15.2: Intra project Cumulative Effects Matrix [APP-141] noted that intra-project cumulative effects on vehicle users were already considered in ES Chapter 12: Traffic and Transport [APP-080] and were therefore not considered further in the intra-project CEA to avoid double-counting.</p> <p>Temporary road and lane closures required by the project would have a very short duration, typically two weeks or less. Paragraph 7.3.22 of the Transport Assessment [APP-061] notes that none of these closures would be sufficient to exceed the assessment thresholds set out in the EIA Scoping Report [APP-156] and they therefore did not require assessment in the Transport Assessment [APP-061]. Use of local highway authority Permit Schemes to coordinate the street works required for the project is also already secured in the Construction Traffic Management Plan [REP6-025]. It is therefore very unlikely that there would be any intra-project cumulative effects on the public transport network.</p>
TT2.13.5	<p>The Equality Impact Assessment ([REP3-047] page 18) states, 'there may be potential for differential impacts on younger and older people, and disabled people due</p>	<ol style="list-style-type: none"> 1. The Equality Impact Assessment is based on groups of the population and available data; the assessment is presented on groups of the population. As there are very limited numbers of people using the PRow in the Order Limits, as evidenced in Table 12.5 in ES Chapter 12: Traffic and Transport [APP-080] and in Appendix C of Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034], it is difficult to

Reference	Question	Applicant's Response
	<p>to increased PRow distances and severance during construction'. Can you expand on the following?</p> <ol style="list-style-type: none"> 1. More clearly identify the likelihood of these impacts (i.e., clarify 'there may be potential'). 2. Explain whether the potential differential impacts would be positive or adverse. 3. Describe how each of the specified groups might be affected. 4. Identify any potential discrimination. 5. Describe the impacts in other relevant areas including health and wellbeing. 	<p>apply the resulting assessment on protected characteristic groups of people to such a small sample size. Note the latter 2023 PRow surveys did not record anyone over 60 years on any of the PRow surveyed. Some younger, older and disabled people will not be affected by the increased PRow distances and severance, while others would be more affected, hence the conclusion that there may be potential for differential impacts. As the EQIA is reporting at a community level rather than on individuals, it identifies the types of impact that could be experienced (i.e. increases in PRow distances and severance) and the vulnerability of equality groups to these types of impacts, should they occur.</p> <ol style="list-style-type: none"> 2. The potential differential impacts (should they occur) due to increased PRow distances and severance during construction would be short term/temporary adverse. 3. Each of the specified groups may be affected by not being able to use a particular PRow for recreation and physical fitness for a short period of time during construction or that the time taken to walk the diversion route would take longer than would normally be taken for the unaffected PRow. This may mean that specified groups have to walk further to an alternative PRow or drive to a location before they start a walk. 4. Due to the temporary nature of the change to the PRow and the notifications period of the diverted route that would be given, it is not identified as significant in ES Chapter 12: Traffic and Transport [APP-080], due to the short duration of the impact. Although there is the potential for differential impacts on the equality groups identified, given the availability of alternative and accessible recreational routes in the vicinity it is not considered to result in unfair discrimination against any specific protected characteristic group. 5. The Applicant is not aware of any other impacts of this on health and wellbeing, given the short temporary nature of the PRow closures.
TT2.13.6	<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? 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</p>	<p>The Applicant can confirm that the data in Figure 7 in the Transport Assessment [APP-061] does include the forecast construction staff vehicle movements within the 'Light Goods Vehicle' category. Construction staff vehicle movements in the morning and evening peak hours (split by cars and crew vans in accordance with the assumptions set out in the Transport Assessment [APP-061]) are provided on the traffic flow diagrams in Appendix A: Construction staff vehicle flow diagram to this response.</p>

Reference	Question	Applicant's Response
	morning and evening peak hours? If they do not, why not?	

13.2 Construction Traffic and Route Strategy

Table 13.2 – Construction Traffic and Route Strategy

Reference	Question	Applicant's Response
TT2.13.7	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?	<p>Project related signing would be designed in the detailed design stage and comprise two categories of signing, both in accordance with The Traffic Signs Regulations and General Directions 2016 (TSRGD):</p> <ul style="list-style-type: none"> • Temporary traffic management signing, in accordance with Chapter 8 of Traffic Signs manual. These are typically portable signs and signals as required to implement traffic control for either road closures or lane closures, as appropriate for each location. These would be processed under the permit system. • It is possible that other signing may be required such as post-mounted signs for temporary speed limits. <p>It is not anticipated at this stage that any signs in either category which are not prescribed in TSRGD would be required. Should such a requirement be identified, the mechanisms provided for in the Framework Highways Agreement – which is currently in development - would be used to provide site-specific authorisations acceptable to the Local Highway Authorities. It is anticipated that any such signs would form part of the works proposals which would be subject to Road Safety Audit as provided for by Requirement 11(3) of the draft DCO [REP6-003].</p>
TT2.13.10	How were the daily traffic movements referenced in the Transport Assessment [APP-061] calculated?	<p>Forecast daily project traffic movements have two components: construction staff movements and construction vehicle movements (light goods vehicles and heavy goods vehicles). The calculation of construction staff movements is covered in the Applicant's response to question TT2.13.11. The Transport Assessment [APP-061] is based on the forecast peak month in the alternative scenario in ES Appendix 4.2: Construction Schedule [APP-091] for construction staff movements and construction vehicle movements combined: August 2025.</p> <p>The starting point for the calculation of daily construction vehicle movements is the monthly vehicle requirements set out in the Transport Assessment Construction Vehicle Profile Data [REP4-006]. These requirements are reasonable worst-case assumptions based on the Applicant's standard practices for construction of transmission lines and the knowledge of an experienced contractor in electrical infrastructure delivery.</p> <p>The daily movements used in the Transport Assessment [APP-061] are calculated from the monthly figures summarised above using the following steps:</p>

Reference Question	Applicant's Response
	<ul style="list-style-type: none"> ● The maximum monthly vehicle requirement in the seven-month period centred on the August 2025 peak (i.e. May-December 2025) is used for each access point. For example, with reference to Appendix A in the Transport Assessment Construction Vehicle Profile Data [REP4-006], 2,900 vehicles is used as the forecast for access point H-AP20 - this is the forecast for June 2025, the maximum in the seven-month period. The seven-month period is used to account for potential changes to the programme that may align peak periods at different access points. ● Maximum monthly vehicle requirements are then divided by 4.3 to generate a weekly vehicle requirement. ● Weekly vehicle requirements are then divided by 7 to generate an initial daily vehicle requirement. ● The initial daily vehicle requirement is then multiplied by 1.125 (i.e. uplifted by 12.5%) to calculate the final daily vehicle requirement. This accounts for potential variation in traffic volumes generated by the project in any given hour within the peak month. ● Each vehicle required is assumed to make an empty journey in the opposite direction (i.e. a requirement for one vehicle translates to one inbound movement to site plus one outbound movement from site). ● Daily vehicle movements are then allocated to the local road network between the relevant access point and an appropriate junction on the strategic road network based on the principles set out in Section 2.4 of the Transport Assessment [APP-061]. <p>The process summarised above, which translates monthly vehicle requirements into daily movements, introduces a substantial level of contingency into the calculation. For example, Appendix A of the Transport Assessment Construction Vehicle Profile Data [REP4-006] indicates a total of 14,104 construction vehicles would be required by the project in August 2025. Using the maximum monthly total at each access point between May and December 2025 increases the number of vehicles assessed in the peak month to 19,854, an increase of over 40%.</p>
<p>TT2.13.11 How was the peak staff requirement referenced in the Transport Assessment [APP-061] calculated?</p>	<p>The peak daily staff requirement was calculated for every month in the construction programme (the 'Alternative Scenario' in ES Appendix 4.2: Construction Schedule [APP-091]) by an experienced contractor in electrical infrastructure delivery. The requirement is a reasonable worst-case based on the Applicant's standard practices for construction of electricity transmission lines.</p> <p>The Transport Assessment [APP-061] is based on the forecast peak month in the Alternative Scenario for construction staff movements and construction vehicle movements combined, which is August 2025. As set out in paragraph 6.2.5 of the Transport Assessment [APP-061], 350 staff per day would be required by the project in this peak month.</p> <p>To develop the Transport Assessment [APP-061], the maximum daily staff requirement in the seven-month period centred on the August 2025 peak (i.e. May-December 2025) is used for each access point. This accounts for</p>

Reference	Question	Applicant's Response
		potential changes to the programme that may align peak periods at different access points. As set out in Table 6.1 of the Transport Assessment [APP-061], using the daily maximum at each access point in this seven-month period increases the number of staff assessed to 528, an increase of over 50% above the August 2025 requirement. This introduces a substantial level of contingency into the assessment.

13.3 Public Rights of Way

Table 13.3 – Public Rights of Way

Reference	Question	Applicant's Response
TT2.13.14	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?	<p>As set out in paragraph 12.4.33 of ES Chapter 12: Traffic and Transport [APP-080], DMRB LA 112 does not provide any quantifiable categories for defining magnitude of impact on severance caused by traffic flow changes. Consequently, the Walkers, Cyclists and Horse Riders (WCH) severance assessment was undertaken with reference to withdrawn DMRB guidance and the Guidelines for the Environmental Assessment of Road Traffic (GEART) (Institute of Environmental Assessment, 1993). The withdrawn DMRB guidance was submitted to the examination as Appendix G in the Applicant's Responses to First Written Questions [REP3-052].</p> <p>Both the withdrawn DMRB guidance and GEART suggest quantifiable magnitude of impact categories for severance based on percentage changes in traffic flow. The 'Built up Area' values in Table 1 on page 7/1 of the withdrawn DMRB guidance indicate that a 60%+ change in traffic flow represents a 'substantial' impact on severance. This is more onerous than both the 'Rural Area' values in the same table and the values suggested in GEART, which indicates in paragraph 4.31 that '<i>changes in traffic flow of 30%, 60% and 90% are regarded as producing 'slight', 'moderate' and 'substantial' changes in severance respectively</i>'. Consequently, it was assumed in the WCH severance assessment in ES Chapter 12: Traffic and Transport [APP-080] that traffic flow changes greater than 60% would initially be categorised as having a 'Large' impact, in line with the most onerous categorisation in withdrawn DMRB guidance. This is set out in the Applicant's Comments on Suffolk County and Babergh Mid Suffolk District Councils Local Impact Reports' [REP3-049] (see reference 12.68).</p> <p>The withdrawn DMRB guidance was also used because it provides a quantifiable threshold for when severance becomes an issue related to the absolute level of traffic on a road. It states in paragraph 7.4 that the guidelines in Table 1 on page 7/1 '<i>do not apply to roads with an existing AADT flow of less than 8,000 vehicles</i>'. GEART does not include an equivalent threshold, and it was deemed relevant to the assessment as baseline traffic on many roads in the study area is very low, creating the potential to over-estimate impacts by just considering percentage change in traffic. Paragraph 12.4.35 in ES Chapter 12 [APP-080] consequently indicates that the 8,000-vehicle threshold was used to downgrade magnitude of impact on some roads in the assessment.</p>

Reference Question	Applicant's Response
	<p>Table 3.1 in ES Appendix 12.1: Traffic and Transport Significance of Effects Tables [APP-134] sets out the results of the WCH severance assessment. The Applicant notes that in practice, the 8,000-vehicle threshold was only applied to downgrade magnitude of impact on two roads: Rands Road and Church Road, Twinstead - Eastern Segment. On both these roads, combined daily baseline plus project traffic in 2025 is forecast to be less than 400 vehicles per day, which would not lead to any significant severance effects for WCH using these roads. On all other roads, the percentage change categories set out in the Applicant's Comments on Suffolk County and Babergh Mid Suffolk District Councils Local Impact Reports [REP3-049] were applied in line with the most onerous categorisation in withdrawn DMRB guidance.</p>
<p>TT2.13.15</p> <p>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:</p> <ol style="list-style-type: none"> The likely time needed by walkers, cyclists and horse riders to travel each proposed diversion route? The likelihood that walkers, cyclists and horse riders would be dissuaded from making their usual journeys? The safety of walkers, cyclists and horse riders diverted onto the public highway? 	<p>The assessments of project effects on severance and amenity, fear and intimidation for walkers, cyclists, and horse-riders (WCH) reported in ES Chapter 12: Traffic and Transport [APP-080] were focused on the impact of forecast temporary changes in traffic flow on the public highway due to project construction vehicles (including vehicles used by staff commuting to and from construction sites).</p> <p>The conclusion of these assessments was that (accounting for proposed mitigation) there would be no significant effects on WCH, as project traffic during the peak construction period would be low. ES Figure 12.4 [APP-154] indicates (on the pages titled 'Daily Construction Traffic and Staff Vehicles') that on all but three roads (A131, A1071 and A1214), the project would add less than 100 vehicles per direction per day during a short peak construction period, even with substantial contingency included in the forecast. The three roads are the main roads in the study area that typically carry more than 5,000 vehicles per direction per day, on some sections more than 10,000. It is therefore very unlikely that project construction traffic would result in WCH diverting from their usual routes along or across the public highway; spending significant additional time completing their usual journeys; or being dissuaded from making their usual journeys.</p> <p>The assessment of WCH journey length reported in ES Chapter 12: Traffic and Transport [APP-080] considers the effect of temporary project interactions with PRoW, including temporary closures and diversions. The magnitude of impact criteria for this assessment, set out in ES Appendix 5.4 [APP-096], were defined based on Design Manual for Roads and Bridges (DMRB) LA 112 Population and human health guidance (National Highways, 2020). Table 3.12 in DMRB LA 112 indicates that WCH magnitude of impact should be defined based on the additional length of journeys that WCH would need to make. It does not refer to any requirement to assess the additional time needed for WCH to complete journeys or the likelihood of WCH being dissuaded from making a journey. These impacts are both related to additional journey length and therefore are already implicitly considered in the assessment.</p> <p>It is the Applicant's view that DMRB LA 112 is appropriate guidance for assessing the construction traffic and transport impacts of a linear infrastructure project (and has been used on other consented linear infrastructure projects such as the Richborough Connection project). The Applicant also notes that the Guidelines for the Environmental Assessment of Road Traffic (GEART) (Institute of Environmental Assessment, 1993) are specifically concerned with road traffic impacts and do not refer to impacts on PRoW.</p>

Reference Question	Applicant's Response
	<p>The Transport Assessment [APP-061] considered the impact of the project on road safety on all roads where the project would add construction traffic during the peak construction period. Baseline personal injury and collision data was analysed as set out in Section 4.3 and Appendix A, and the assessment concluded (in Section 7.3) that the project would have no material impact on any baseline road safety issues. Most PRow interactions are expected to be of short duration (four weeks or less) as set out in Appendix A of the PRow Management Plan (PRowMP) [REP3-056]. Multiple PRow survey programmes (including the 2013 and 2021 surveys reported in Section 4.5 of the Transport Assessment [APP-061] and the 2023 surveys submitted as Appendix C of the Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]) have also indicated very low usage of PRow across the Order Limits. The PRowMP [REP3-056] also commits the Applicant and its contractor to maintaining the safety of PRow users during construction. It is therefore very unlikely that any safety issues would occur due to WCH being diverting onto the public highway.</p>

References

Department for Environment Food and Rural Affairs (2023) Local Nature Recovery Strategies

Department for Energy Security and Net Zero (2023) The Community Benefits for Electricity Transmission Network Infrastructure

Department for Energy Security and Net Zero (2023) Transmission Acceleration Action

Department for Levelling Up Housing and Communities (2023) Getting Great Britain building again: Speeding up infrastructure delivery

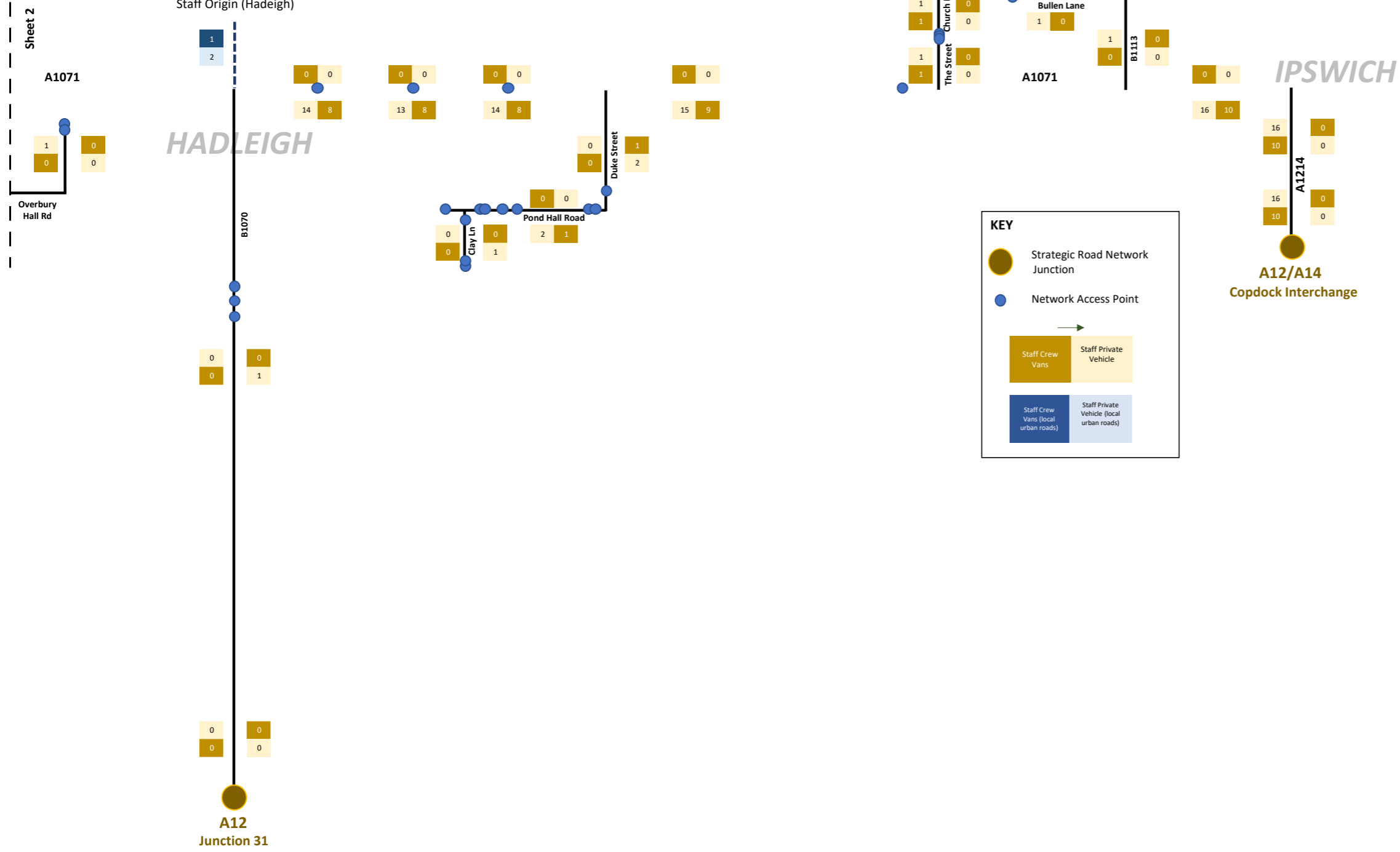
Glover (2019) Landscape Review. Available from: <https://assets.publishing.service.gov.uk/media/5d8a19a3e5274a083d3b78bd/landscapes-review-final-report.pdf>

Minister for Levelling Up, Housing and Communities (2019) Planning Practice Guidance

Appendix A: Construction Staff Vehicle Flow Diagram

AM Peak Hour (0800-0900) Construction Staff Vehicles

Sheet 1



KEY

- Strategic Road Network Junction
- Network Access Point

Staff Crew Vans	Staff Private Vehicle
Staff Crew Vans (local urban roads)	Staff Private Vehicle (local urban roads)

Staff Origin (Sudbury)

Sheet 1

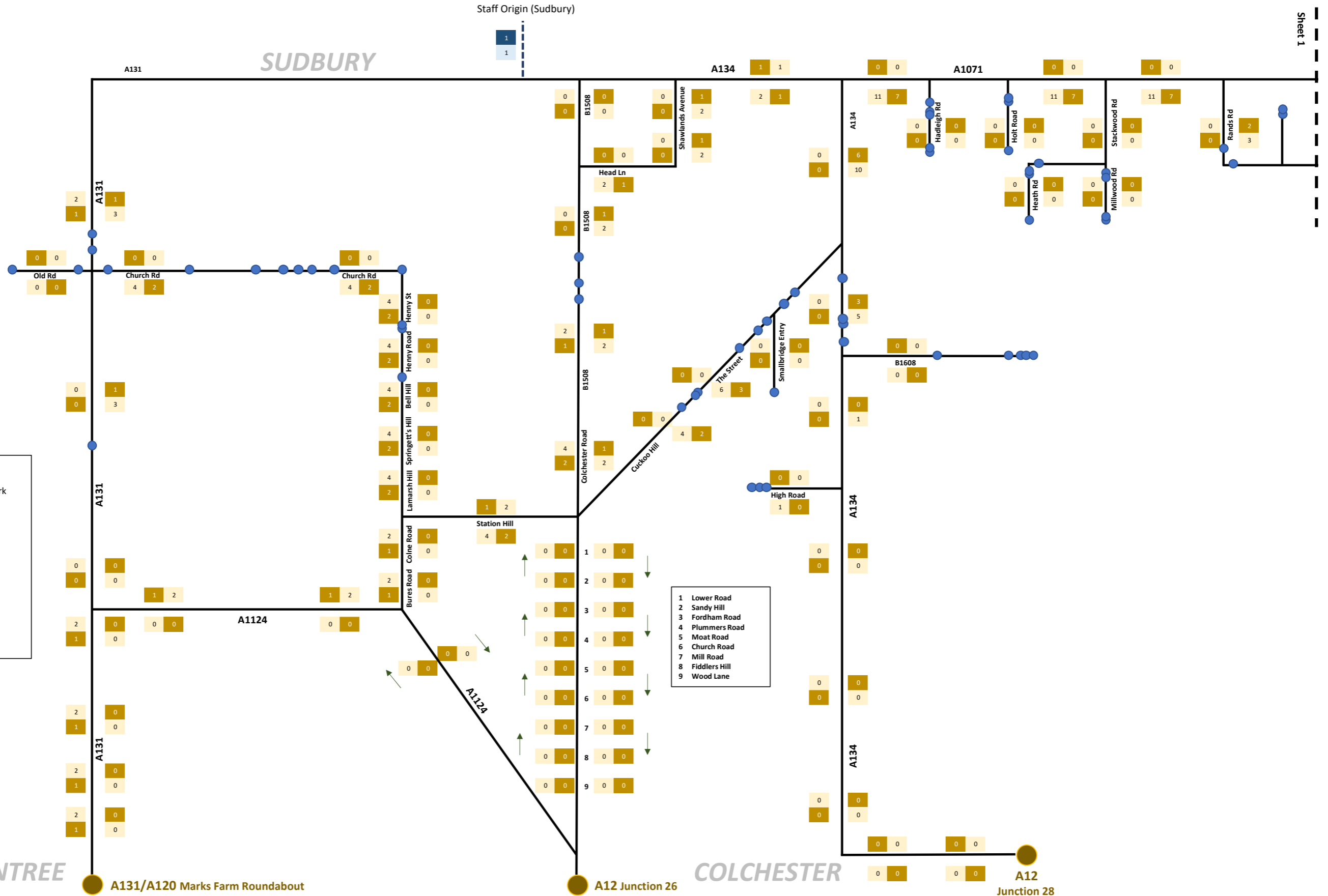
SUDBURY

BRAINTREE

COLCHESTER

KEY

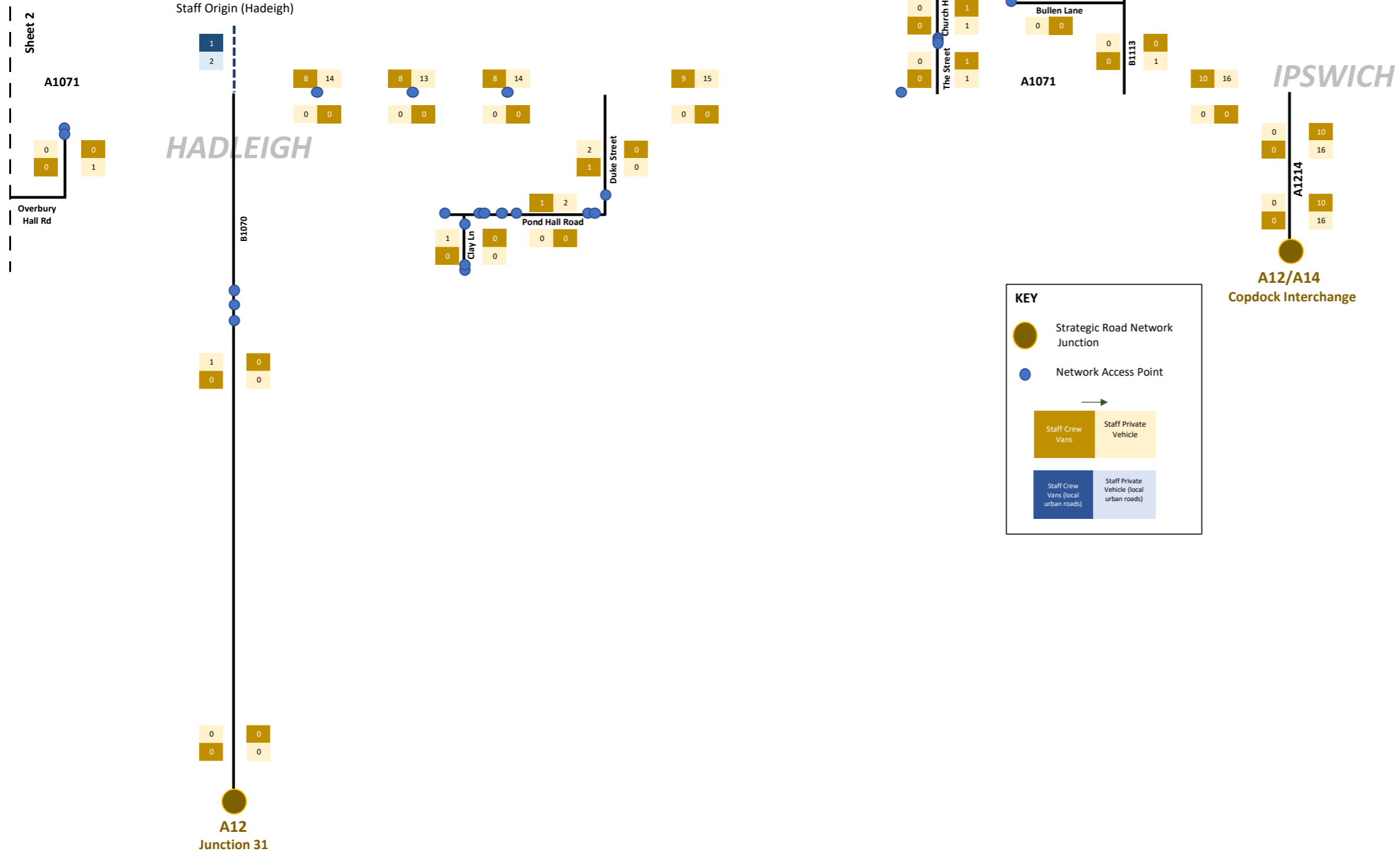
- Strategic Road Network Junction
- Network Access Point
- Staff Crew Vans
- Staff Private Vehicle
- Staff Crew Vans (local urban roads)
- Staff Private Vehicle (local urban roads)



- 1 Lower Road
- 2 Sandy Hill
- 3 Fordham Road
- 4 Plummers Road
- 5 Moat Road
- 6 Church Road
- 7 Mill Road
- 8 Fiddlers Hill
- 9 Wood Lane

PM Peak Hour (1600-1700) Construction Staff Vehicles

Sheet 1



KEY

- Strategic Road Network Junction
- Network Access Point

Staff Crew Vans	Staff Private Vehicle
Staff Crew Vans (local urban roads)	Staff Private Vehicle (local urban roads)

Staff Origin (Sudbury)

Sheet 1

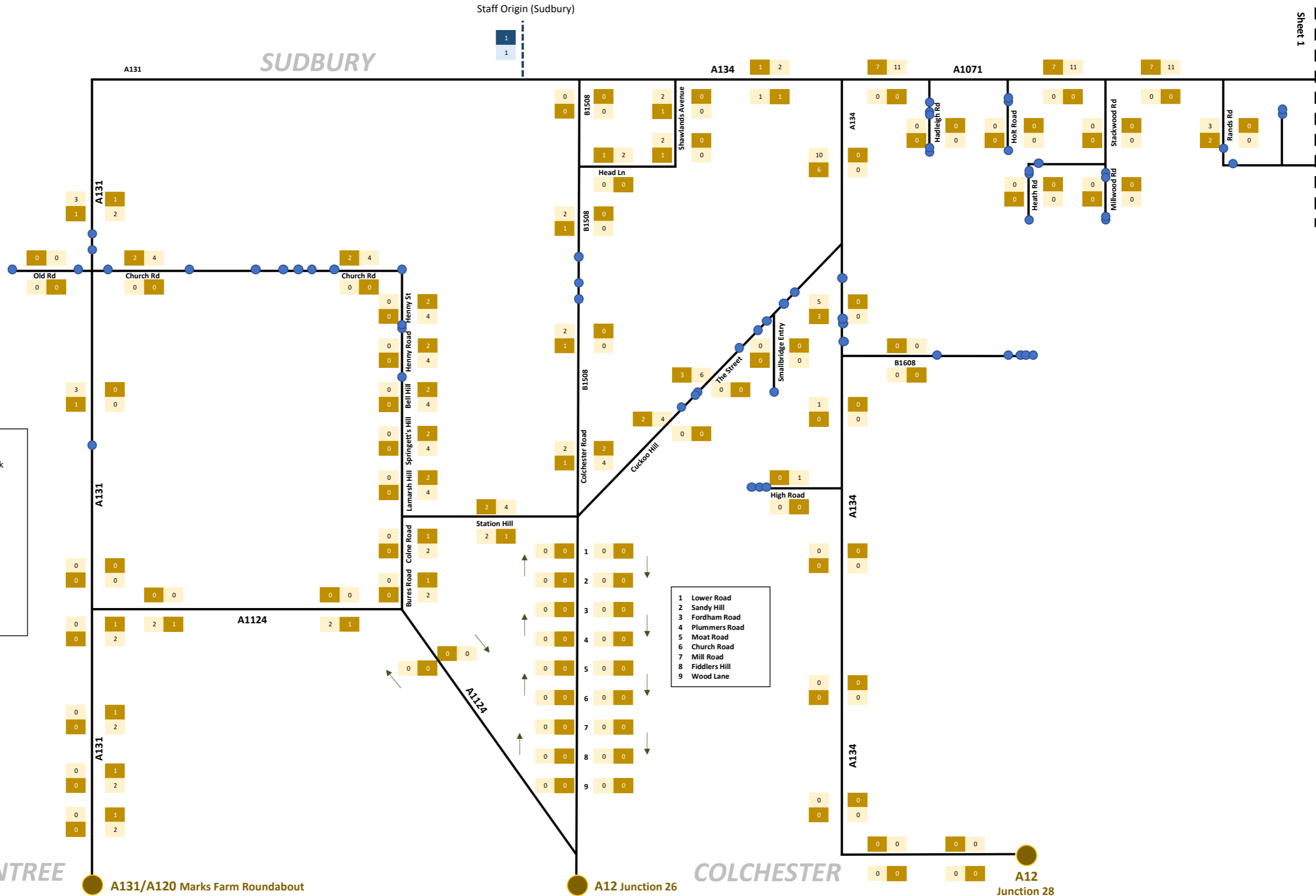
SUDBURY

KEY

- Strategic Road Network Junction
- Network Access Point

Staff Crew Vans	Staff Private Vehicle
Staff Crew Vans (local urban roads)	Staff Private Vehicle (local urban roads)

- 1 Lower Road
- 2 Sandy Hill
- 3 Fordham Road
- 4 Plummers Road
- 5 Moat Road
- 6 Church Road
- 7 Mill Road
- 8 Fiddlers Hill
- 9 Wood Lane



BRAINTREE

COLCHESTER

A131/A120 Marks Farm Roundabout

A12 Junction 26

A12 Junction 28

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