

NORWICH TO TILBURY

EN020027

Relevant Representation

Suffolk County Council

Registration reference FC74BF695

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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

“The Council” / “SCC” refers to Suffolk County Council.

1. Introduction

1. The following sections set out the Council's Relevant Representations in respect of the Norwich to Tilbury 400 kV grid reinforcement DCO proposals. A Report setting out the draft Relevant Representations was approved by Cabinet at the meeting of the 4 November 2025.

2. Level of detail

2. The Council notes the recent changes to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, which mean that Relevant Representations are now required to be "where practicable, the full particulars of the case". Because SCC expects to be invited to submit a Local Impact Report ("LIR") in due course, it should be noted that full technical details of the Council's case will necessarily follow in the LIR.

3. Policy

3. The Council recognises that, whilst the development of infrastructure to enable security of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed.

4. Need case and alternatives

4. In conjunction with Essex County Council and Norfolk County Council, the Council commissioned an independent report from Hiorns Smart Energy Networks to review the need for the National Grid Reinforcements in East Anglia being promoted by NGET (**Appended**). That report was submitted to NGET in November 2023 in response to its non-statutory consultation. The report concluded that, having regard to the realities of when connection of new generation sources to the transmission network was likely to be required, an exceedance of current or committed transmission network capacity (including the Bramford to Twinstead Reinforcement which is currently underway) was not likely before 2035 (as opposed to the date of 2030 suggested by NGET). As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore HVDC link, and it could not be concluded that the NGET proposal was the best option. NGET responded to that report in April 2024 suggesting that it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations. Whilst the Council notes that response, it is also the case that the Secretary of State is not a party to any of NGET's connection contracts or licence conditions and, notwithstanding that those matters may be material, they cannot be seen as over-riding when balancing the overall public interest. There is a process of reform of the system of connection arrangements, via Queue Management, currently underway and the Secretary of State is able to take a holistic position looking strategically at how the transmission network can best be improved.
5. While the Council recognises the principal need of grid reinforcement, it considers that it is premature for NGET to submit this DCO application until alternatives have been

considered in full, and objects to the application because this work has not been undertaken. The Council would prefer further investigation of alternatives such as a coordinated offshore solution or High Voltage Direct Current undergrounding.

5. Undergrounding and other alternatives routes

6. NGET proposes to underground the cables in the sections under the Dedham Vale National Landscape. The Council supports this as a way of reducing the visual and landscape impact of the Norwich to Tilbury proposed development.
7. Whilst the proposed areas of undergrounding are supported, the Council is conscious of the concerns from local communities of the visual impact of the remaining sections of overhead lines.
8. The Council considers that other alternatives such as offshoring or undergrounding the entire length of the route between Norwich and Tilbury should be given further consideration particularly as the Council believes that the Norwich to Tilbury proposals are not required until the middle of the 2030s.

6. Cumulative Impacts

9. In terms of cumulative impacts these include the 400kV grid reinforcement proposals by NGET between Bramford and Twinstead, which would also connect at Bramford substation. This project (also a NSIP) was consented by the Secretary of State on the 12 September 2024 and is currently under construction. Bramford substation is already a focus for a number of energy related projects consented under the Town & Country Planning Act by Babergh & Mid Suffolk District Councils. Along the route there are also emerging proposals for additional solar farms and associated battery energy storage.
10. Further afield there are also cumulative impacts with other NSIP proposals including Sizewell C Nuclear Power Station for example with potential skills shortages.

7. Archaeology

11. Suffolk County Council Archaeological Service (“SCCAS”) does not object in principle to the Proposed Development. However, without a full programme of archaeological, geoarchaeological, and palaeoenvironmental evaluation to inform a robust mitigation strategy, the scheme risks causing avoidable harm to the Historic Environment. This would be contrary to EN-1 section 5.9, which requires impacts (both direct and indirect) to be understood, and harm avoided or minimised through design and mitigation, with loss of archaeological assets preserved by record where justified.
12. Given the linear nature of the Proposed Development, which will traverse diverse archaeological landscapes of East Anglia (river terraces, clay plateaus, and valley floors), there is potential for remains and deposits of local to national significance. Establishing their significance requires evaluation (geophysical survey, trial

trenching, coring, and deposit modelling) prior to finalising designs, as required by EN-1.

13. Responsibility for heritage matters is divided as follows:

- a. Built heritage (designated and non-designated buildings, conservation areas): Babergh Mid Suffolk District Council (“BMSDC”)
- b. Scheduled Monuments: Historic England
- c. Archaeology: Suffolk County Council Archaeological Service (SCCAS)

14. SCCAS has engaged positively with the Applicant and their consultants during pre-application and will continue constructive engagement throughout the Examination, including via the draft Development Consent Order (“dDCO”), Local Impact Report, Written Representations, and Statements of Common Ground.

Principal Issues and Risks

Incomplete Archaeological Evaluation

- 15. Archaeological evaluation (geophysical survey and trial trenching) has not been completed across all areas of development impact. Further work is required to establish archaeological potential and inform appropriate mitigation strategies, in line with HEAN 17 and ClfA standards. This must be secured through robust Requirement wording.
- 16. Investigations to date have identified multiple previously unrecorded sites of local and regional significance, requiring mitigation should consent be granted. This indicates a high likelihood of further unrecorded assets being identified along the remainder of the route. Any remaining evaluation should therefore be undertaken at the earliest opportunity post-consent to ensure mitigation strategies can be developed and integrated into project programmes.
- 17. Provision must also be made to address any additional areas of significance identified during evaluation, including preservation in situ where remains of national importance are encountered.

Geoarchaeological and Palaeoenvironmental Assessment

- 18. The programme of geoarchaeological sleeved coring, deposit modelling, and palaeoenvironmental assessment to enable detailed stratigraphic analysis (e.g. pollen, diatoms, macrofossils) and scientific dating of buried sequences remains incomplete in areas where Quaternary deposits, alluvium, and peat may be affected (e.g. watercourse crossings). This work must be secured by robust Requirement wording and scheduled early enough to inform design and mitigation.

Mitigation Strategies

- 19. No archaeological mitigation has yet been undertaken. Mitigation will be secured through the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (“AMS-OWSI”). This process document must set out the framework for producing Detailed Written Schemes of Investigation (“DWSI”), to

be submitted to and approved by the Local Authority Archaeological Advisors (“LAAA”) and the Local Planning Authority (“LPA”) before works commence.

20. The submitted AMS-OWSI does not currently meet national standards or local guidance, nor does it secure an adequate level of assessment and mitigation as required under EN-1 and EN-5. SCCAS comments on the submitted version must be addressed before it can be considered acceptable.
21. Although the revised AMS-OWSI now includes methodologies for further assessment and mitigation, the proposed approaches remain inadequate. Additional field evaluation is required to inform appropriate mitigation strategies. The archaeological Requirement should therefore allow for amendment of the AMS-OWSI to reflect new discoveries.
22. Where remains are to be preserved in situ, whether due to significance or design constraints, they must be protected from damage during pre-commencement, construction, and operation. A strategy for their long-term protection must be incorporated into the mitigation framework, supported by a Historic Environment Management Plan (“HEMP”) agreed with SCCAS to ensure appropriate management in perpetuity.

Draft DCO requirement

23. The draft Schedule 3 requirement for archaeology does not provide adequate protection for the Historic Environment. SCCAS will submit detailed comments and proposed wording at the Local Impact Report stage, setting out robust requirements for archaeology, geoarchaeology, and palaeoenvironmental matters to secure evaluation, mitigation, reporting, publication, and archiving in line with national and local guidance.

SCCAS request

24. To assist in resolving outstanding issues, SCCAS requests that the Applicant provide:
25. **Route-wide Evaluation Plan and Programme** – identifying locations of completed and proposed geophysical survey, trial trenching, geoarchaeological and palaeoenvironmental assessments across all areas of development impact.
26. **An approved Archaeological Management Strategy and Outline Written Scheme of Investigation (AMS-OWSI)** – prepared in accordance with ClfA, Historic England, and local guidance, and in line with Local Authority Archaeological Advisor comments.
27. **Geoarchaeological and Palaeoenvironmental Strategy** – defining key river valleys and sequences, with detailed sampling, dating and analytical methodologies to inform design and mitigation.
28. **Draft OREAC/OCEMP** – setting out archaeological controls to appropriate standards.
29. SCCAS will provide detailed comments on the submitted documents at the Local Impact Report.

8. Ecology

30. In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant. The scope and extent of the desk study and field surveys is considered to have resulted in a thorough and detailed baseline of data on which assessments can be accurately based. The methodologies used for collection of baseline information and assessment are considered suitable for the specific purpose of this proposal.
31. However, at the time of writing, the information provided within the Environmental Statement (“ES”) and its appendices regarding field survey data and subsequent assessments is incomplete due to the outstanding 12.5% coverage of the land within the Order Limits. These data and assessment updates have been scheduled for publishing in November 2025. All comments within this document on Ecology and Biodiversity are therefore caveated in lieu of scrutiny of this additional information. This gap in information is acknowledged throughout the ES and its appendices and reasons for this delay have been given. Verbal feedback from the Applicant’s team has indicated that no significant alterations to the Environmental Impact Assessment (“EIA”) receptors for Ecology and Biodiversity are expected based on initial results from these works.
32. The proposals within the Order Limits would have no direct impact on any internationally designated sites. The assessment of potential impacts upon the Stour and Orwell Ramsar and Special Protection Area (“SPA”) sites and proposed mitigation and precautions as detailed within the ES, Code of Construction Practice (“CoCP”) and Landscape and Ecology Management Plan (“LEMP”) adequately address any potential issues relating to the qualifying interest of the sites.
33. The proposals within the Order Limits would have no direct impact on any nationally designated sites. The assessment of potential impacts upon Middle Wood Site of Special Scientific Interest (“SSSI”) and proposed mitigation and precautions as detailed within the ES, CoCP and LEMP adequately address any potential issues relating to significant accidental, incidental or indirect impacts on qualifying interest of the sites.
34. The scope and subsequent assessment of impacts on all locally designated wildlife sites and habitats within the assessment area but outside of the Order Limits are considered suitable for the proposed development.
35. The scope and subsequent assessment of impacts on all locally designated wildlife sites and habitats within the Order Limits are considered suitable for the proposed development. The proposed mitigation to mitigate for potential impacts within these areas are well defined and are likely to result in the predicted negligible residual impacts providing the robustness of the CoCP and LEMP and the efficacy of the Ecological Leak of Works (ECoW) are sufficient to enable the appropriate procedures and task to be implemented effectively. We shall expect to be consulted and will make appropriate observations on any CoCP and LEMP.
36. Mitigation for permanent habitat loss via Biodiversity Net Gain (“BNG”) areas, “Environmental Areas” and additional locations for tree planting etc. appears to

be generally sufficient to provide replacement and potential gain. The Council's three for one replacement principle for trees must be followed within this process.

37. The mitigation required for replacement of "Important Hedgerows" however must be seen to take into account not only their intrinsic species and structural value but their value as functional corridors for other flora and fauna communities across the wider landscape. Therefore, wherever possible planting and replanting must take place in as close proximity to possible as the lengths lost and in such a way as to provide functional connectivity with remaining hedgerows in these areas.
38. The Council would like to reiterate that irreplaceable habitats (e.g. veteran trees) must always be fully protected and avoided wherever possible and the design of the scheme should go to extraordinary lengths to ensure this is the case.
39. The approach regarding Invasive Non-Native Species (INNS) within the ES chapter refer to ensuring that no spread is caused by the proposals. It is the Council's view that rather than simple prevention of an offence through mitigation, ecological enhancement would be achievable by a commitment to eradicate INNS within the Order Limits when encountered, rather than just preventing spread.
40. The protected and notable fauna species surveys and assessments appear suitable to ascertain the baseline conditions for the site. Where protected species have been identified as receptors, the proposed mitigation, use of licenses and proposed implementation of the ECoW appears well designed to meet all legal, conservation and ecological requirements.
41. In regard to breeding and wintering birds, the Council requires clarification regarding the mitigation and compensation for permanent habitat loss. Whilst it is agreed that on the most part populations occurring within the Order Limits are of local value and displacement into surrounding habitat would be unlikely to result in significant impacts, if mitigation is considered necessary with regard to habitat replacement for breeding and/or wintering birds, this area should be a separate mitigation area and not considered to be covered by BNG areas. BNG is not designed or expected to provide mitigation for faunal species by purpose but rather to provide a gain to the habitat units of an area and therefore it's incidental benefits to faunal groups should not be considered when providing mitigation for habitat loss on these groups. I.e. areas for replacement habitat should not also be used for BNG. If it is the case that no habitat placement is required to result in negligible impacts, this should be clear in the ES rather than suggesting BNG land will act as mitigation.
42. The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group. Given the size and complexity of the site, the Council would like to ensure that sufficient resources are available for the ECoW role to be effectively carried out through all stages of the proposals. The hierarchy of responsibilities outlined within the LEMP indicates this will be the case but lacks specifics at this stage regarding the manpower and locations of ECoWs during the works and operation as required.

Once these details are known, the Council would like to be able scrutinise this detail within the Ecology Working Group.

43. The Council welcomes the consideration of future potential impacts, specifically potential changes to habitat and faunal groups associated with the WaLOR project.
44. The long-term success of the BNG habitat will need to be guaranteed through a detailed HMMP or similar, not only stipulating the required creation and management to provide the 10%+ gain but also including contingency planning and monitoring to be able to identify any failures and facilitate replacements and or adaptations to management to ensure long term gain.
45. The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.
46. The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.
47. Further, more detailed comments may be provided in the Local Impact Report in lieu of outstanding survey data, results and assessment.

9. Economy, Skills and Tourism

Workforce Demand and Skills Assessment

48. The ES recognises construction workforce needs but does not provide the granular modelling by project phase (civils, mechanical and electrical, commissioning) that SCC's Supplementary Guidance requires. This omission prevents accurate alignment with local training pipelines.
49. The Applicant assumes that only 10% of the construction workforce will be drawn from the Wider Study Area. This risks underestimating local labour capacity and opportunity, while also failing to model displacement effects from other NSIPs (Sizewell C, Sea Link, North Falls, Five Estuaries).
50. Without agreed, scenario-based modelling (low/medium/high local engagement), there is no robust basis to forecast impacts on transport, housing, or public services.
51. SCC requires the Applicant to work with the Regional Skills Coordination Function ("RSCF") to co-produce an evidence-based, phase-by-phase workforce model, consistent with SCC's Supplementary Guidance.

Cumulative Workforce Pressures

52. The ES does not sufficiently address cumulative competition for labour across Suffolk and the wider region.

53. Norwich to Tilbury will overlap temporally with Sizewell C, Sea Link, and multiple offshore wind projects. These projects will compete for scarce skills in project management, civils, and M&E trades.
54. SCC is concerned about displacement effects: diversion of skilled staff from local construction, education, health, and SME sectors, leading to delivery risks for essential services and local projects.
55. The Applicant must demonstrate how cumulative workforce demands have been considered and commit to coordinated regional workforce planning with SCC and other promoters.

Supply Chain Opportunities and Risks

56. The ES notes potential for supply chain benefits but lacks a scenario-based assessment of local procurement opportunities.
57. SCC's guidance requires promoters to distinguish hyper-local (district), local (county), and regional (East of England) supply chain opportunities, and to assess them under low/medium/high engagement scenarios. This has not been undertaken.
58. Without such modelling, there is no robust estimate of indirect or induced employment or Gross Value Added ("GVA").
59. There is also insufficient recognition of potential negative effects, including wage inflation, diversion of capacity from SMEs, and supply chain saturation due to overlapping NSIPs.

Governance and Delivery

60. SCC expects all major infrastructure promoters to agree governance arrangements for skills and supply chain delivery through the RSCF.
61. Norwich to Tilbury has not yet committed to such governance. Without this, there is no assurance that workforce and supply chain benefits will be realised or that adverse impacts will be mitigated.
62. SCC requires a formal commitment to:
 - a. Participate in the RSCF skills governance framework.
 - b. Participate in the Major Infrastructure Forum
 - c. Co-fund or support targeted skills interventions linked to project phases.
 - d. Work with SCC to design monitoring frameworks to evidence outcomes.

10. Flood and Water Environment

63. Suffolk County Council, as the Lead Local Flood Authority ("LLFA") has several matters that need to be agreed prior to agreeing the statement of common grounds. These include, but are not limited to: -
 - a. FRA to be updated to include latest published national flood maps.
 - b. ES includes all the current legislation & guidance.

- c. Ensure that Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES has been updated with desktop studies, assumptions etc
- d. LLFA will require surface water drainage to be in accordance with the National standards for Sustainable Drainage Systems (“SuDs”) and the SCC LLFA local guidance.
- e. The LLFA considers that temporary drainage for construction shall be provided for approval in the form of a construction surface water management plan.
- f. LLFA reserves its position regarding the Protective Provisions for Section 23 of the Land Drainage Act and are in communication with the other Local Flood Authorities and Internal Drainage Boards to ensure consistency and consensus amongst all parties.

11. Highways

- 64. Comments herein are based on partial sight of the documentation at the time of writing and additional matters may be raised once all information has been reviewed.
- 65. As a Local Highway Authority (“LHA”), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on road users and local communities and propose typical working hours of Monday-Friday 0700-1900 and Saturday 0800-1300. This may be exacerbated in areas subject to significant seasonal fluctuation such as agriculture or tourism.
- 66. However, the DCO and supporting management plans should be sufficiently flexible to allow for approval of highway works outside the stated working hours where for example deemed necessary due to restrictions on the highway network to avoid excessive delays for roadworks.

Scoping

- 67. Whilst SCC accepts that most transport impacts for the operational phase are scoped out it considers that the AIL operational movements should be included with assessment. This is due to concerns about the resilience of the routes, for example being compromised by weight or other limits being placed on the network, together with the impacts of any temporary measures to overcome these. SCC accepts that inclusion of improvements to the Lorraine Way / Bullen Lane junction is a move towards this.

Draft Development Consent Order (dDCO) / OCTMP

Pre-commencement works

- 68. It is understood the dDCO includes construction of the temporary accesses within the definition of pre-commencement whilst the OCTMP states it will be inclusive of these works. This places a tension between the OCTMP commitment to use of agreed site access and haul roads and that construction of the haul road will be post commencement.

Road Closures and Traffic Regulation Orders

69. Careful programming of any road closures is required so that they do not coincide and cause unnecessary delays or confusion to road users. SCC has yet to be provided with details to review.

Protection for the Highway Authority

70. Disapplication of parts of the New Roads & Street Works Act 1991 (the 1991 act) should not fetter LHA in managing highway network (co-ordination), recovering reasonable costs and avoidance of long-term maintenance costs.
71. The undertaker should maintain temporary works for duration (not 12 months).
72. SCC will seek protective provisions or similar agreements to protect the safety of those using the public highway and local rate payers incurring costs resulting from this project and its long-term impacts.

Management Plans

73. As the Outline Construction Traffic Management Plan will be applicable to the pre-commencement works (as described in section 1.8.1) the document will need to be robust enough to cover these.
74. The applicant will need to retain overall control of the Construction Traffic Management Plan (“CTMP”) particularly if multiple contractors are responsible for the roles as occurs in other similar projects.
75. SCC considers it would be appropriate for the Secretary of State to control numbers and routes of Heavy Goods Vehicles (“HGV”) during the construction period as recommended in 5.14.14 of EN-1 Overarching National Policy Statement for Energy.

Transport Impacts of Construction

Working Hours

76. As an LHA, the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays, as per section 2.3) on roads used for recreational purposes and the uninterrupted impacts on local communities.

Abnormal Indivisible Loads (AILs)

77. This project appears to be largely proposing a road only freight strategy with the exception of Abnormal Indivisible Loads (“AIL”) arriving by sea. SCC would welcome efforts to explore the practicality of aggregate deliveries through local ports and railheads.
78. SCC will require more than 72 hours’ notice of AIL movements taking place outside of the core hours as otherwise delays may occur if loads cannot safely pass over weaker structure. Early engagement on all AIL movements is essential and lack of engagement may result in movements being delayed.

Highway Access Routes

79. The estimate numbers of HGVs are similar to other energy projects (EA1(N), Bramford to Twinstead). This volume of movements will have negative impact for the highway network in the construction period, most noticeable, but not exclusively, on minor roads where existing HGV use is low.

80. With the number of NSIPs and other large infrastructure projects in East Anglia significant pressure is being put on the available facilities for HGV drivers and this matter should be considered by the applicant.
81. The authority recognises there is balance between a haul road dominated access plan as in this application and the alternative of many local accesses. The former requires significant volumes of material for haul roads but avoids use of unsuitable local roads and in the case of Norwich to Tilbury the impacts in highway terms are lessened by the projects approach. Note that this may not be the best solution for other disciplines.
82. In highway terms, SCC supports the inclusion of a temporary haul road to bypass the village of Holton St Mary to reduce impacts through the village and avoid the tight bends and narrow roads on the B1070. Note that this may not be the best solution for other disciplines.
83. Terminology used in the application must be consistent. For example, on plans made available to SCC the term bellmouth is used throughout but elsewhere there is a discrimination between a site access (i.e. where construction traffic gains access to the site) and crossing point (where no access is permitted).
84. The council is concerned that some of the access routes proposed for construction traffic are not appropriate for the significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are:
 - a. bends south of Rickinghall
 - b. manoeuvrability under the railway bridge at Gislingham
 - c. manoeuvrability at the crossroads at Finningham
 - d. manoeuvrability under the railway bridge at Finningham
 - e. A1120 / Saxham Street junction (NW of Stowupland)
 - f. Mill Lane, Stowmarket (sharp bends, tight)

Highway Mitigation

85. SCC have yet to review the details of the assessment. However, based on the information available SCCs specific concerns are:
 - a. safety, particularly at evolved junctions where delays joining the main carriageway may result in driver frustration.
 - b. that the impacts on the Major Road Network (“MRN”) are not considered, in the case of Suffolk specifically the road safety at the A140/A143, Stoke Ash junctions.
 - c. there is a reliance on others providing mitigation at the A1071/B1113 e.g. Beagle Roundabout.
86. Potential improvements for passage of AILs has not been considered such as the A1120 Cedars Link and A140 Brockford Street Bridge which have restrictions on AIL use.

87. SCC would welcome discussion on whether certain areas of mitigation can be left in place rather than removed at the end of the project.

Cumulative Impact

88. SCC considers that in the case of cumulative impact there is a particular need for there to be direct consideration of an important aspect of inter-project effects, which is not at present adequately captured by the ES or the TA. SCC considers there is a third type of cumulative impact other than Intra-project and Inter-project effects. This is the repeated impact of multiple NSIPs or other major projects in a geographical location over a length of time, specifically repeated impacts on a community by repeated delivery of these schemes. An example would be a series of repeated closure of PRow which would have a cumulative impact on amenity, severance and public health.

Environmental Impact

Air Quality

89. It is understood that the applicant has agreed within the standard mitigation that the applicant will ensure all on-road vehicles comply with the requirements of the London Low Emission Zone standards where applicable. This appears to be discretionary. SCC would expect a commitment for HGVs to comply with relevant emission standards e.g. EURO VI with appropriate monitoring and enforcement.

Construction Traffic

90. The assessment of driver and public transport delay should include the impacts of any significant diversions for roads closed during construction.
91. In terms of severance, fear and anxiety for pedestrians, cyclists and horse riders SCC remains concerned about the impacts, practically where PRow are diverted onto adjacent roads, especially if these are also used by the project's construction traffic or workers.

12. Landscape

Key issues

92. SCC considers that the key issues for landscape and visual matters that will need to be addressed by the Applicant during examination are around mitigation and compensation, including consideration of change requests put forward by SCC and BMSDC in August 2024:
- a. Proportionate, landscape scale compensation in the Waveney Valley and south of Diss following the decision not to provide undergrounding of the high voltage electricity line through the Waveney Valley
 - b. Exploration of further options to mitigate the adverse impacts of the scheme around Mellis and Gislingham
 - c. Opportunity for restoration of the historic landscape and for Biodiversity Net Gain at the poplar plantation west of Wickham Skeith

- d. Exploration of further options to mitigate the adverse impacts of the scheme in the Gipping Valley, through potential changes in alignment or undergrounding of the 400kV line, as well as further rationalisation of the existing 132kV and 33kV networks, south-east of Stowmarket in particular, as part of this project
- e. Positive strategic placemaking around Bramford substation
- f. Effects of undergrounding on the Dedham Vale National Landscape
- g. Consideration of additional sections of Horizontal Directional Drilling (“HDD”)
- h. Comprehensive mitigation and screen planting around Cable Sealing End (“CSE”) compounds

Technical and presentation issues

93. Apart from the key issues with regards to the scheme itself, comments are offered at the end of this section with regards to technical and presentation issues, such as:
- a. The importance of Good Design
 - b. Approach
 - c. Documentation of vegetation losses to establish a robust baseline,
 - d. Visual assessment and its presentation
 - e. Reinstatement planting, Biodiversity Net Gain and landscape and visual mitigation,
 - f. Full application of the Mitigation Hierarchy, including compensation for residual landscape and visual impacts
 - g. Outline LEMP and other control documents

The Waveney Valley and change requests south of Diss

94. SCC considers the Waveney Valley to be a highly valued and highly sensitive landscape and has provided evidence to support this. The Waveney Valley west of Diss is a shallow, intimate landscape consisting of a distinct valley floor and gentle valley sides. It is within an area that was previously designated as a Special Landscape Area in Mid Suffolk. In the South Norfolk Local Plan, it is recognised as a valued landscape.
95. While SCC acknowledges that the new proposed alignment of an overhead line, east of Wortham Ling SSSI and west of Roydon Fen Local Nature Reserve, would reduce adverse effects of the scheme to the west of Wortham Ling SSSI, on Listed Buildings and Bressingham Steam and Gardens, the proposed alignment is now crossing the Waveney Valley in a more remote, yet publicly accessible area, previously recognised as a Special Landscape Area.
96. The Angles Way is a 93-mile long-distance walking trail from Great Yarmouth to Thetford, following the river Waveney and the powerline would be expected to dominate the valley floor in this area. Additionally, the alignment proposed in the

submission documents is, in landscape and visual terms, worse than that from the last consultation. Towers RG85 – RG87, would no longer run parallel to the Angles Way but cross it at a very shallow angle, exacerbating the PRoW users' experience of walking underneath the powerline. SCC considers that the alignment in this area should be reconsidered.

97. SCC considers that the significant adverse effects on landscape character and visual amenity in this area resulting from the proposal as currently presented, would be incapable of mitigation and severe in their level of harm.
98. SCC welcomes the extension to the proposed undergrounding of the existing 132kV powerline north to tower PKF35 (from PKF 28). However, SCC considers that this does not effectively rationalise the various powerlines to the west of Palgrave and that the undergrounding should have been extended further, to partially offset the impacts of the scheme.
99. SCC considers that the further rationalisation (undergrounding) of the existing 132kV powerline all the way to Diss substation or as near as possible to it (around PKF40, near Elm Vale Farm), would compensate to some degree for the adverse impacts of the proposals in this area by reducing the extent of the cumulative wire-scape to the south of Diss and in the Waveney Valley. This would also benefit several Listed properties in the area and PRoWs, which the 132kV line currently crosses.
100. SCC welcomes the change in alignment of the proposed 400kV line in order to protect the function and flight path of Brook Farm airstrip.

Exploration of further options to mitigate the adverse impacts of the scheme around Mellis and Gislingham

Mellis Common

101. SCC notes that the route is aligned to avoid crossing Mellis Common. However, the adverse visual effects on views from this Conservation Area remain moderate-major, therefore significant, according to the Applicant's own assessment (Doc Ref 7.12, Figure 7.12 F26_VP2.05c and e, Viewpoint 2.05: Mellis Road, Mellis Green). SCC considers that adverse effects might in fact be major and that the viewpoint assessment does not sufficiently address the perceptual qualities within the views from the common and its cultural heritage aspect. The sequential nature of the effects, when walking around the common, also do not appear to have not been addressed. SCC considers that changes to the design of the powerline should be considered to reduce the adverse effects on this area.
102. Currently there are four directional changes (at towers RG108, RG110, RG112, and RG117) to the north-east of Gislingham. SCC acknowledges that this alignment was probably chosen to avoid impacts on the setting of the moated site at Moatyard Plantation. However, this includes crossing Burgate Road twice, which is likely to result in significant adverse effects and disbenefits for the visual amenity along this route, which is used for recreation.
103. SCC considers, without prejudice, that there is potential to avoid the double crossing of Burgate Road by locating the powerline between Burgate Road to the

west and the Moatyrd Plantation to the east, while still respecting the setting of the moated site, (by starting the route change at RG 108). This would also largely avoid cutting through the Green Lane connecting Burgate Road and Mellis Road. In landscape and visual amenity terms this would be a significant improvement to the alignment. This would also help to reduce cumulative effects with other energy proposals (solar) in this area.

104. SCC further considers, without prejudice, that the concentration of energy infrastructure at Burgate Road could be further reduced by continuing the undergrounding of the UKPN line to PKF 14 and providing robust screen planting around the CSE compound.

Access points from Thornham Road/Major Lane, Gislingham

105. SCC welcomes that the proposed access to the construction corridor between Thornham Road/Major Lane and Coldham Lane has been removed from the scheme, avoiding thereby considerable adverse effects for ecology and cultural heritage. According to the Arboricultural Impacts Plan (AIP) mature trees on either side, including one veteran tree, will now not be affected by the scheme. It is still now proposed to use a track south of Coldham Lane, but according to the AIP this would not affect any trees west of railway line. SCC further welcomes that the promoter now proposes to use the existing field path, just east of the railway embankment, along a route which minimises impacts on trees.

Opportunity for restoration of the historic landscape and for Biodiversity Net Gain (BNG) at Poplar Plantation west of Wickham Skeith

106. It is notable that the current alignment north of a visually prominent poplar plantation has been modified in comparison to earlier consultations. A tower that was previously placed in the middle of a probable roman site to the north of the plantation (<https://heritage.suffolk.gov.uk/Monument/MSF7298>) has been moved further west. The line still crosses the poplar plantation, but further west than the original crossing point.
107. The poplar plantation itself is in a small field, with the River Dove flowing through it. The field is bounded to the north and south by hedgerows with prominent and locally characteristic pollard oak trees, some of which show veteran characteristics, historically there were also Elm pollards present. During the 1960s the entire area underwent a comprehensive and extensive programme of field amalgamation. However, this small stream side enclosure remained intact, because the river was too large to be piped. The field could not be incorporated into the adjacent land to the north and was bounded to the south by Wickham Road. However, the landowner did take the opportunity to plant commercial hybrid poplars (*Populus × canescens*) onto the site, certainly with a view to selling these, possibly for match production. See Ordnance Survey mapping from 19039 and 195310.
108. Cutting through this relatively short-lived commercial plantation to make way for the overhead line is likely to increase the risk of wind-throw for the remaining trees, which are now comfortably middle-aged. This could create a serious risk for users of Wickham Road and the PRow in and adjacent to the plantation.

109. Therefore, it is essential that these trees are carefully inspected to understand their current health and disease profile, and how they might react to the significant change in their environment by the removal and disturbance of part of the plantation. Depending on the findings of these inspections, and notwithstanding the visual prominence of this plantation, the most responsible approach to forestall the anticipated public safety / access and highway risks associated with the ageing and deterioration of this plantation may be to remove the entire plantation.
110. Should this be the case, SCC considers that this would present a unique opportunity for the Norwich Tilbury project to deliver significant historic landscape and biodiversity gains at this site.
111. The extensive work necessary to accommodate the new pylons would provide the opportunity for the site to be cleared, de-stumped, and for the previous historic landscape of the riverside meadow to be revealed.
112. SCC considers that throughout this process, it is essential for the final alignment to avoid impacts on the historic pollard trees in the site boundary, and those on the southern side of Wickham Road.

Public Rights of Way (PRoW) west of Wickham Skeith

113. The currently proposed alignment crosses Wickham Road at a point where two PRoW meet.
114. One PRoW leads westwards through the plantation to Eastlands Lane. This PRoW would be part of the restoration proposals, with the potential for additional voluntary open access, subject to landowner agreement.
115. The PRoW leading south-east from Wickham Road would, under the current proposals meet the power line again where it ends at a single-track lane to the south. Previous hedgerow restoration adjacent to the west of this PRoW, which would provide some screening from the close-range views of the power line along this route, and which would further improve over time, is put at risk by the current proposals. The adverse visual and amenity effect on the PRoW users will be increased by the current alignment. SCC considers that the alignment should be adjusted as it will be essential for public amenity to appropriately protect this hedge and its young hedgerow trees during the construction and operation phase of the scheme.
116. Exploration of further options to mitigate the adverse impacts of the scheme in the Gipping Valley, through potential changes in alignment or undergrounding of the 400kV line as well as further rationalisation of the existing 132kV and 33 kV networks, south-east of Stowmarket in particular, as part of this project

Gipping Valley, Needham Market, Stowmarket to Bramford

117. SCC welcomes the proposed rationalisation and incorporation into the project of the existing 132kV line in this area but considers that there is a wider opportunity for a comprehensive scheme of undergrounding to include 132kV and 33kV infrastructure that would, subject to archaeological constraints, compensate for,

through offsetting, the harm of the 400kv line, providing significant landscape and heritage benefits.

The Gipping Valley

118. SCC is disappointed that the Promotor has not taken on board the request to realign the 400kV line through the Gipping Valley from its current alignment further to the west and continues to have concerns about the proposed alignment through the wider Gipping Valley, and considers that the currently proposed alignment through the Gipping Valley requires re-configuration.
119. While the Gipping Valley has in many parts lost its remote, tranquil and undeveloped character, there are still pockets where field patterns and the spatial relationship between the valley sides and the valley floor are legible. In these areas, which were formerly identified as a Special Landscape Area, any development can have a profound visual impact, in particular new vertical elements within the valley side landscape, such as pylons.
120. The current alignment passes closely to the east of Creeting Hall, through one such area, crossing two small tributary valleys, that were formerly a Special Landscape Area and still exhibit the key characteristics and features such as small fields bordered by hedgerows and visually prominent trees and pockets of grasslands. Whereas, to the west of Creeting Hall, the land rises to an open plateau landscape which has been subject to a comprehensive programme of agricultural improvement and rationalisation of boundary features.
121. Therefore, SCC requests that the alignment is moved to the west of Creeting Hall by changing the alignment between RG161 and RG168. This would also result in reducing the adverse effects to the setting for the Grade II* Listed Creeting Hall.
122. SCC considers that the potential additional adverse effects on St Peter's Church (Grade I Listed), the war memorial (Grade II Listed) and Glebe House (Grade II Listed) and their settings that may result from this change request would need to be assessed.

Further rationalisation of the existing 132kV network generally, and south-east of Stowmarket in particular, as part of this project

123. The southern valley sides of the Gipping River retain a more intact landscape pattern and provide an important setting for the valley as well as for Stowmarket and Needham Market. Located on these southern slopes south of Stowmarket is the significant cultural heritage site of Badley Hall Farm and St Mary's Church cluster.
124. As the visual assessment (Doc ref 7.12, Figure: 7.12.F37_VP2.16a-e, Viewpoint 2.16: PRoW near Badley Hall Farm (Badley 21)) shows, the setting of this cluster is already impacted by two existing 132kV powerlines, passing the site to the east in close proximity. A further powerline crosses the approach from the B1113. With the addition of the proposed 400kV powerline the setting of this cluster would be further significantly eroded. SCC considers that it would be appropriate and reasonable to compensate for the impacts of the new 400kV powerline through a

comprehensive scheme of undergrounding of the 132kV and other lower voltage lines in this area.

125. Holyoak Farm and the settlement of Combs, which are currently sandwiched between two powerlines would be additional areas, where undergrounding or rationalisation of 132kV and 33kV powerlines would provide compensation for the adverse effects of the proposed 400kV powerline in form of wider landscape restoration.

Positive strategic placemaking around Bramford substation

126. SCC is concerned that the cumulative effects around Bramford substation will result in a landscape dominated by pylons and electricity infrastructure, with a wide-ranging visual envelope. The Council considers it essential that the Applicant should focus on strategic positive placemaking around Bramford substation, to address the significant adverse effects on landscape character and visual amenity in this area, resulting from high voltage electricity transmission infrastructure converging. This should include rationalisation and/or undergrounding of power lines, as well as strategic planting and placemaking at a landscape scale. The cumulative effects of the proposed reinforcement of the Bramford to Twinstead line must also be addressed in this context and acknowledged on the Norwich to Tilbury plans and drawings as well as in the assessments.

Bramford to Dedham Vale National Landscape (NL) (formerly Area of Outstanding Natural Beauty (AONB))

127. SCC welcomes the proposed funding of a feasibility study for the removal/rationalisation of existing 132kV overhead lines east of Bramford Substation.

Effects of undergrounding on the Dedham Vale National Landscape (NL) (formerly Area of Outstanding Natural Beauty (AONB))

128. SCC welcomes, in principle, the proposals for undergrounding the proposed 400kV line within the Dedham Vale NL, and the efforts made by the applicant to avoid significant adverse effects on honeypot locations, such as Flatford.
129. However, the undergrounding may in itself result in significant adverse impacts and effects on the NL. These are likely to result from the requirement to navigate the complex and wooded valley slopes which define the vale, the need to cross the river Stour west of Stratford St Mary and navigate various waterbodies on the valley floor, to cross the Black Brook in a further, parallel, tributary valley to the south, as well as the A12 near Langham.
130. The landscape within the NL is intrinsically sensitive and change can result in significant adverse effects on the immediate environment, as well as on longer distant views across the valley. The new proposed alignment is likely to result in significant adverse effects on longstanding and traditional landuse patterns and in the loss of mature trees, which form an integral part of the landscape.
131. SCC considers that the Promoter has a duty to minimise adverse effects on trees and hedge, and is concerned about some of the proposed access routes for

example at the track heading east from West Lodge, northwest of Langham Hall (Project Design Section C, Page 31 of 63).

Wenham/Raydon

132. The Council welcomes the siting of the Cable End Sealing compounds so that they avoid significant harm to the Dedham Vale National Landscape and Raydon Airfield. Although in order to ensure that a conflict with Raydon Airfield is avoided, moving the Cable End Sealing Compounds further north to Lattice Tower JC026 in the vicinity of Wenham Thicks would be beneficial. It would also lessen the impacts upon and the Grade II Listed Buildings at Wenham Grange and Vauxhall. The Council is concerned that this request is not reflected in the current proposals.
133. As the location of the CSE compound remains unchanged under the current proposals, SCC welcomes that the cable corridor now is proposed to head east rather than west at the very beginning of the undergrounding from the CSE compound. This is likely to result in the loss of fewer field trees in this area. It would still need to be clarified, whether or not the CSE compound and the current arrangement are interfering with the landing strip of Raydon Airfield and any archaeological constraints.

The undesignated landscape south of the NL

134. SCC welcomes the proposal to continue the undergrounding to the EACN Substation, as this would reduce the adverse effects outside the NL, especially around Ardleigh, and on views from the NL.

Consideration of additional sections of Horizontal Directional Drilling (HDD)

135. SCC re-iterates that additional HDD (in addition to further HDD requests elsewhere) should be considered by the Applicant to minimise the adverse effects on landscape features that are integral to the NL and its setting.

Approach to Glebe Farm

136. Without prejudice to comments from Essex County Council and Colchester City Council, SCC notes the changes in alignment that have been made around Langham Hall and Glebe Farm, Langham (a Grade II listed Farmhouse and Barn). SCC welcomes that the cable corridor now avoids the approach to the farm and the young avenues leading up to it. However, SCC queries what the reasons are behind the placement of construction compound JC-CC03 (Doc Ref: 6.4.F1, Figure 4.1 – Project Description - Proposed Project Design Section C, Page 31 of 63), and whether this could be re-considered. It appears that the compound and attenuation basin, are isolated from the cable corridor and necessitating a temporary haul road of considerable length, which would still cut through the avenue of trees leading up to Glebe Farm and one other tree line resulting in the loss of at least five trees and a considerable length of hedgerow along Rectory Road (Doc Ref: 6.13.A6.F1, Figure A13.6.1 - Landscape and Visual Arboriculture Impact Plan, page 173 of 352). SCC considers that this may be avoided, if the compound was located to the between Rectory Road and Dedham Road and accessed from Dedham Road. It is acknowledged that this would result in

additional adverse effects on the residential receptors along Dedham Road and would have to be weighed up carefully. However, these additional adverse effects would be limited to the construction period and would preserve the fabric of the landscape and the setting of Glebe Farm. While Glebe Hall is not situated within the National Landscape (NL), it is within 500m of the NL to the west, north and east, and arguably part of the setting of the NL.

137. SCC welcomes that the woodland block near Springfield Farm is now to be avoided (Figure 4.1, Page 32).
138. From here, corridor leads on, east of Priory Cottage to the cross the Black Brook. Here a large, wooded area, including a veteran tree (T566), and large parts of an avenue of trees is earmarked for removal (Doc Ref: 6.13.A6.F1, Figure A13.6.1, Page 175 of 352. SCC considers that this area should be assessed in detail and that vegetation losses should be reduced/minimised through micro-siting and that HDD drilling should be considered to cross the Black Brook. In particular, every effort should be made to avoid harm to the veteran tree.

Comprehensive mitigation and screen planting around Cable Sealing End (CSE) compounds

139. SCC considers that the required Cable Sealing End compounds will need to be carefully sited and mitigated. As a design principle, Cable Sealing End compounds should be sited away from the more sensitive valley sides, on the plateaux, where the potential for successful effective screening through strategic landscape scale planting may be achieved. Site selection for Cable Sealing End Compounds should further be guided by existing landscape features as well as built structures, which should be utilised to help embed the compounds into their surroundings.

The importance of Good Design

140. Paragraph 2.2.6 of the National Policy Statement for Electricity Networks Infrastructure (EN-5) states that ‘locational constraints identified [...] do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in Sections 2.4-2.9.’
141. Paragraphs 2.2.8 -2.2.12 add:
 - a. ‘2.2.8 There will usually be a degree of flexibility in the location of the development’s associated substations, and applicants should consider carefully their location, as well as their design.
 - b. 2.2.9 In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts (See Section 2.10 below and Section 5.10 in EN-1).
 - c. 2.2.10 As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence

holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can, to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”

- d. 2.2.11 Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023.
 - e. 2.2.12 Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally.’
142. SCC considers that there is the opportunity to achieve a coherent landscape design approach for all Cable sealing End Compound sites and substations along the route, which should be explored by the Applicant.
 143. This should be based on the Mitigation Hierarchy, as defined in the Glossary of Overarching National Policy Statement for Energy (EN-1), November 2023: The ‘avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.’
 144. SCC therefore expects the Applicant to provide measures of compensation, where residual harm persists beyond measures to avoid, reduce and mitigate.
 145. SCC would support the principle of a Design Champion (para 4.7.5, Overarching National Policy Statement for Energy (EN-1), November 2023) being engaged sufficiently early in the development of the project to oversee the design process, primarily within highly sensitive landscapes and around substation and Cable Sealing End Compounds, where positive placemaking will be essential. Further, there would be opportunities for the Design Champion to contribute to back-checking of various alignment alternatives and to the integration of the proposals into the landscape at the detailed design, construction, and operational stages of the project, including micro-siting of pylons. As this this work will need to straddle both engineering and landscape disciplines, two key leads may be required to work in close collaboration.
 146. The skillset required of a Design Champion has not been clearly defined within the National Infrastructure Strategy. The Institution of Civil Engineers (ICE) and the National Infrastructure Commission Design Group (NICDG) have produced a useful working paper ‘Defining and developing the design champion role’, (August 2022), in this respect.

Approach

Rochdale Envelope

147. SCC welcomes the application of the Rochdale Envelope but considers that this needs to be remembered both at the DCO decision making stage and throughout the detailed design stage and in all control documents. The Rochdale Envelope, presenting a reasonable worst-case scenario, requires that micro-siting and rationalisation of construction options are integral in further reducing harm to landscape features, landscape character and visual amenity post-consent.

Approach to rationalisation of the UK Power Networks 132kV pylons and of UKPN Low Voltage 24/11 kV/33 kV and Openreach wood pole infrastructure

148. As the rationalisation and/or undergrounding of 132kV powerlines and of low voltage infrastructure along the reinforcement route from Norwich to Tilbury is expected to form an essential part of the mitigation and compensation for the scheme, SCC considers that further technical clarity and certainty are required, in particular, regarding how this work would be managed contractually, and how it would be controlled.
149. While the single trenches and working corridors are reduced in scale in comparison with the proposal's 400kV infrastructure SCC considers that a full assessment of impacts and effects, including vegetation loss and impact on archaeology will be required.
150. SCC further requests detailed information with regards to the Decommissioning Strategy for the 132kV power lines, for example, whether foundations will be removed to plough depth.
151. As it is proposed that this work is undertaken by third party statutory undertakers, and the works have to be implemented prior to commencement of construction of the Norwich to Tilbury Line (ES, Chapter 4 – Project Description, paragraph 4.8.88), SCC would welcome some information on the Applicant's cooperation and coordination with the third parties to achieve this, on programming and envisaged timelines for separate applications, and clarification as to whether these would TCPA applications.

Existing Baseline and Documentation of vegetation losses

Baseline data

152. SCC assumes that the Applicant is aware of tree and hedge data from Suffolk Biodiversity Information Service (SBIS) for mapping and data and the Joint Babergh and Mid Suffolk District Council Landscape Guidance Joint Babergh and Mid Suffolk District Council Landscape Guidance, 2015.
153. SCC considers that the proposals regarding the Bramford to Twinstead reinforcement should be included in plans, drawings and assessments as a likely part of the baseline.

Access Points, visibility splays, temporary access routes and work compounds

154. SCC considers that proposed temporary access points and routes, as well as compound areas, need to be carefully considered, fully assessed and ground-

truthed with regards to existing vegetation (trees, hedges and woodland) that may be affected. Visibility splays need to be fully considered in this context. SCC considers it essential that temporary works, in particular, are rationalised and co-ordinated with the purpose to avoid and minimise impacts on vegetation. Temporary haul roads should not lead along narrow, tree-lined or wooded tracks. The default vegetation management for visibility splays should be hedge coppicing, not hedge removal.

155. No compounds or laydown areas shall be located within the National Landscape, except HDD compounds.
156. Where conflicts with mature vegetation of landscape, amenity or screening value are identified, alternatives should be actively sought by the Applicant. SCC welcomes that one particularly concerning example at Gislingham (Coldham Lane), has been removed from the scheme, but there may be others (for example the proposed access from High Road, Diss, Norfolk, leading to the Grade II Listed Farmhouse at Grove Farm, although the AIA predicts that no trees would be affected by the proposals).

Hedgerows

157. It appears that the hedgerow surveys are currently incomplete. SCC would welcome clarification, why some potentially important hedgerows were not chosen for survey (Doc Ref: 6.8.A3 Figure A8.3.1 - Ecology and Biodiversity - Hedgerows Regulations Assessment, Page 1 of 24) and if/when the Applicant intends to complete the surveys.
158. There should be a clear listing of how many metres/ kilometres of hedge are permanently or temporarily lost, how many kilometres will be coppiced and how many kilometres of hedgerow will be retained through HDD. This should be done for each section of the scheme to inform the mitigation requirements in different areas and needs to include all enabling works, such as haul roads, site compounds, access points and all works associated with the removal and undergrounding of section of 132kV power lines and other required associated works that need to be undertaken by Third Parties to enable the Scheme.
159. Please note for Appendix 8.1 Habitat Report, Chapter 4 Results, paragraphs 4.2.13 ff:
 - a. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists Hedgerows as habitats of principal importance in England, as boundary and linear features.
 - b. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan.
 - c. No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP need to be assessed and to agree replacements as part of the landscaping scheme.

160. SCC considers that important hedgerows for the purposes of this scheme should include:
- a. Those meeting the Hedgerow Regulations (1997), including the criteria for Archaeology, History, Wildlife and Landscape as listed in Schedule 1 of the Regulations. If bat surveys identify 20 or more passes by bats the hedgerow should be considered important as a bat corridor.
 - b. All the hedgerows where one or more passes of a barbastelle have been recorded - due to the rarity of the species and margin for error in recording. The Regulations do not appear to set out a basis for a threshold of 5 passes.
 - c. Those that perform an important visual function.
161. To enable full understanding and assessment of locations of important hedges, and areas, where either Horizontal Directional Drilling (HDD) needs to be undertaken, or off-setting of residual impacts needs to be agreed, SCC would ask the Applicant to:
- a. Append a column which identifies, by reference to the Hedgerow Regulations (1997), why hedgerows are considered important.
 - b. Display the above hedges on a colour – coded map of an appropriate scale, distinguishing between the different criteria. This should also include the additional hedgerows covered by points 2 (bat passes) and 3 (visual importance) above.
 - c. Confirm that the hedgerows in the DCO limits have been assessed against all the criteria in the hedgerow regulations, regarding, for example the presence of other protected species (Part II 6 (3)) and proximity to rights of way (Part II 8).
 - d. Provide photos of each of the hedgerows which fall within the definition of 1, 2 and 3 above as and in accordance with point C. This will provide a reference for the baseline.
 - e. Confirm which hedgerows the Applicant is proposing to HDD.

Trees

162. SCC welcomes the Arboricultural Impact Assessment (AIA) and Tree Survey in accordance with BS 5837:2012 Trees in relation to design, demolition and construction. This data should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees.
163. For the detailed design stage, there should be a clear, revised record and audit of how many trees are permanently or temporarily lost, how many need to be pruned or coppiced (please define these terms) and how many would be retained. This needs to be done for each section/stage of the scheme to inform the mitigation requirements in different areas and needs to include all enabling works, such as haul roads, site compounds, access points and all works associated with the removal and undergrounding of section of 132kV power lines and other required

associated works that need to be undertaken by Third Parties the enable the Scheme.

164. No works should be allowed to commence until a full Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPA in writing. SCC considers that it is essential that this is secured in the DCO and welcomes that this is addressed in the Outline LEMP.
165. No article in the DCO should authorise any works to any tree subject to a tree preservation order. Such works, if demonstrated to be unavoidable, should be agreed with the relevant LPA on a case-to-case basis so that appropriate compensation can be agreed and secured.
166. The trees that are being lost should be appropriately evaluated by using an appropriate asset-based tree valuation system which calculates the replacement value of each tree and the benefits it provides in terms of carbon sequestration, carbon storage, air pollution removal and rainwater retention. This is to ensure that compensation measures are met for any replacement planting for the loss of those ecosystem services. SCC usually considers that any tree lost to the scheme needs to be replaced with three replacement trees.

Visual assessment and its presentation

Viewpoints

167. SCC welcomes that through desk top study, site work and stakeholder engagement the number of viewpoints was increased from the original 89 to 206, which does appear to be a more appropriate ratio when applied over the 184km of the project, although this still only translates to just over one viewpoint per km, and inevitably leaves considerable gaps. (In comparison, National Grid's Bramford to Twinstead project had an average of 5.3 viewpoints per km.)
168. SCC notes that there appears to be only one viewpoint outside the 3km study area (VP3.20) and that none were considered at a greater distance of up to 5 km from the scheme. SCC considers that there is potential for significant visual effects beyond the 3 km study area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views, and that there may also be additional viewpoints closer to the scheme that should have been assessed.

Viewpoint map

169. It would have been helpful if Figure 13.7 - Landscape and Visual -Visual Receptors and Viewpoints, (Doc Ref 6.13.F7) could have been presented using Figure 4.1 – Project Description - Proposed Project Design (Doc Ref: 6.4.F1) as a base and indicate the viewing direction with a cone. The location maps on the viewpoints assessment pages alleviate the coarseness of the viewpoint map to some extent; however, the scale of the viewpoint map suggests a density in viewpoints that is not matched in the field.

Arrangement and presentation of visualisations

170. SCC welcomes the revised layout of the viewpoint assessment pages with clear location maps with recognizable reference points, and bigger and clearer viewpoint numbers, title and viewing directions.
171. However, the sequence of the viewpoint assessment pages remains confusing, as there is no consistent sequence from north to south along the alignment. It appears that viewpoints that were added later are presented later in the document, and therefore fall outside the geographical sequence, which makes reviewing more difficult.

Reinstatement and Biodiversity Net Gain (BNG) and landscape and visual mitigation

172. SCC welcomes the Applicant's commitment to a 10% minimum BNG, recognising that this is in fulfilment of the obligations with their regulator Ofgem.
173. The pre-requisite to achieving BNG is successful reinstatement planting.
174. With the current, justified focus on BNG and reinstatement, the third element of successful mitigation is in danger of being overlooked and ignored: planting for mitigating the landscape and visual effects of the development.
175. While reinstatement planting would form the basis for landscape and visual mitigation planting, and BNG measures could also achieve landscape and visual mitigation, the rationale and aims for this third element are distinct from the two others: Landscape mitigation seeks to conserve and enhance landscape features and the landscape character impacted by the development, while Biodiversity Net Gain is linked to the habitats impacted. Visual mitigation is required so that the visual effects of development are minimised, by helping to embed the development into the surrounding landscape with effective screen planting, where possible.
176. While the three types of planting are interlinked, the Council does not consider that landscape and visual mitigation requirements are by default satisfied, once reinstatement planting and BNG goals are achieved. The Council expects that full consideration is given to landscape and visual mitigation and, if required, to compensation measures. The Council considers that landscape and visual mitigation planting is offers additional opportunities to the overall BNG being achieved.
177. SCC welcomes the indicative landscape design around the new/ extended National Grid permanent assets (i.e. CSE compounds and substations) (OLEMP Appendix D: Outline Landscape Proposals), designed to provide landscape and visual mitigation while also offering ecological value. SCC will provide further comments on these designs in the Local Impact Report.
178. SCC considers that the planting around these new assets should be managed and maintained for 30 years or for the life-span of the assets, whichever is longer.

Full application of the Mitigation Hierarchy, including compensation for residual landscape and visual impacts

Mitigation

179. SCC has concerns with regards to the terminology regarding different types of mitigation. While SCC agrees with the definition given of embedded mitigation (paragraph 13.6.2), the council considers that the definition for standard mitigation (paragraph 13.6.5) is insufficient, and that for additional mitigation (paragraph 13.6.8) unhelpful and inappropriate.
180. Any planting for Landscape and Visual Mitigation (i.e. which is proposed in addition to reinstatement planting for vegetation that was removed to enable the scheme) with the purpose of screening or filtering views of CSE compounds and/or other elements of the scheme, is considered by SCC to be required and necessary to mitigate impacts and to minimise effects on visual receptors (application of the mitigation hierarchy), and to make the scheme acceptable in landscape terms. It stands side by side with reinstatement planting and planting for Biodiversity Net Gain and cannot be considered ‘additional’ or ‘above and beyond’ (paragraph 13.6.8).
181. Paragraphs 13.6.8 and 13.6.9 appear to contradict each other, the former stating the LVIA has identified a requirement for further mitigation, while the latter negates this. SCC disagrees with paragraph 13.6.9 and considers that further mitigation in form of tree and hedge planting is required for this project.

Compensation

182. Despite the assessment of long-term significant adverse impacts and effects on landscape character and long-term significant adverse effects on visual receptor groups including residents, road users and recreational receptors are likely, the Applicant does not sufficiently explore the fourth column of the Mitigation Hierarchy, Compensation, in the landscape chapter.
183. SCC considers that residual adverse impacts, that cannot be mitigated, will need to be compensated, by means of wider landscape restoration and a coordinated Landscape, Ecology, Archaeology, and Rights of Way Masterplan, in particular, but not exclusively, in areas which are disproportionately affected by energy infrastructure, such as Bramford, Burstall, and the Gipping Valley.
184. In Table 13.1 Engagement undertaken relevant to Landscape and Visual, the Applicant considers offsite tree planting to be compensation. SCC welcomes offsite tree planting as it would contribute to the enhancement of the landscape character and visual amenity. It will be essential to agree an effective mechanism to mitigate/compensate for tree loss, both under the line and in the wider corridor, and a comprehensive programme of planting on a 3:1 ratio should form the starting point. The Council acknowledges that it would be difficult to plant such quantities of trees within the DCO boundary.
185. The Council considers that it will need to be clarified and quantified, to which extent offsite tree planting will be counted towards replacement planting, necessary as a foundation to achieve BNG targets, and how much will be further compensation for the adverse effects of the scheme that cannot be mitigated.

186. The offsite tree planting and wider landscape enhancement is expected to be secured outside the DCO boundary via a Section 106 agreement.
187. The Council notes the measures that have been taken to minimise the impacts of the project on the NL, but notes that NGET accepts that there will still be residual adverse impacts on the natural beauty and special qualities of the NL. In terms of the statutory duty to seek to enhance the natural beauty of the NL, the Council welcomes the positive approach that NGET has taken to proposing a financial contribution to support appropriate enhancement measures within or benefiting the NL, and expects to engage further with NGET, together with other partners, on the details of those measures and how they are best to be secured.

Outline LEMP and other control documents

188. SCC broadly welcomes the Outline LEMP and will provide detailed comments on it and on other control documents in the Local Impact Report.
189. SCC welcomes that the working swathe, will be reduced to 12m, when a hedgerow is being crossed (paragraph 8.3.2, Outline LEMP Doc Ref 7.4). It should also be anchored in the OLEMP, as well as the CoCP and REAC that the default for vegetation management for temporary visibility splays will be coppicing rather than removal of the hedgerows.
190. SCC welcomes that an Arboricultural Impact Assessment and Plan has been provided at submission, which greatly aids the understanding of the effects of the proposals on high category trees. It is further welcome that an Arboricultural Method Statement (AMS) (including Tree Protection Plan) will be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing.
191. SCC will comment in more detail on Tree Protection in the LIR.
192. SCC welcomes that the Applicant has agreed to a five-year adaptive aftercare period for sites with reinstated woodland, trees and hedgerows. This means, planting will need to reach agreed growth and survival rates in order to be moved forward into the next year of agreed aftercare. This may result in different duration of aftercare periods for different types of planting (hedge/scrub/trees/ woodland) or different areas within the scheme.
193. The rationale behind this is as follows: If the reinstatement planting cannot achieve a return to the baseline conditions which existed prior to the development, whether this is because certain elements of habitats cannot be reinstated (such as trees) or because implemented reinstatement planting has failed during the aftercare period, this will impact on, and reduce the percentage of BNG that is achieved elsewhere on site. In other words, more biodiversity measures need then to be implemented to achieve 10% BNG.
194. The Council therefore considers that the aftercare for reinstatement planting needs to be linked to considerations about BNG. This may result in extended aftercare periods, if successful establishment of the reinstatement planting is not achieved within five years. The success, or lack thereof, of the reinstatement planting needs to be considered, when the success of the biodiversity

enhancement measures is evaluated, and management measures are reconsidered.

195. Any tree or shrub that is removed, dies, or becomes seriously damaged or diseased during the aftercare period, must be replaced with suitable replacement plants or trees to the specification agreed in writing with the relevant LPA during the next available planting season (ideally the following November/December).
196. The proposals should allow for the costs of annual post monitoring inspections by and reports to the LPAs for the life span of the project or at least for the first 15 years, and longer if mitigation goals are not being achieved (dynamic aftercare).
197. The baseline to monitor against is the pre-construction baseline data.

13. External Legal Advice on the Draft Development Consent Order

198. **Article 2(1) (interpretation)** – the definition of “maintain” includes the replacement of any part of the authorised development and the replacement of the whole of it. SCC would like to know to what extent “replacement” has been assessed and where this is considered in the Environmental Statement. SCC would like to know to what extent the definition of “maintain” duplicates the applicant’s PD rights.
199. **Article 2(1) (interpretation)** – the definition of “permit scheme” means a permit scheme in force on the date on which the Order is made. SCC consider the definition should allow for the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.
200. **Article 2(1) (interpretation)** – the definition of “pre-commencement operations” is wide-ranging and goes well beyond the Explanatory Memorandum’s (“EM”) description of these works as “de minimis or [having] minimal potential for adverse impacts” (paragraph 3.6.6) [APP-057]. SCC would like to know –
 - a. how each operation will be controlled (especially the “set up works associated with the establishment of construction compounds and temporary laydown areas” and “temporary accesses”),
 - b. which buildings are proposed to be demolished as part of the “pre-commencement operations”,
 - c. whether land used for temporary works will be reinstated to a condition suitable for its former use and, if not, why not,
 - d. the relevant paragraphs of the ES which deal with the assessment of these works. (This request is made in the context of paragraph 3.6.7 of the EM which states: “The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, National Grid considers that the

exclusion of these works and operations from the definition is appropriate”). [APP-057].

201. **Article 3(6) (development consent etc. granted by the Order)** – this provision states that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent they “relate to, are required by or are incidental to the carrying out of the authorised development”. This is a broad power which does not appear to have been included in the precedents cited by the applicant in paragraph 1.2.5 of the EM [APP-057]. It will be remembered that paragraph 1.2 of Advice Note Fifteen: drafting Development Consent Orders states: “A thorough justification should be provided in the Explanatory Memorandum for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/ or controversy in relation to the inclusion of that particular power”. [Emphasis added]. Contrary to the advice, here, no justification for this provision is included in the EM (see paragraph 1.2.5 of the EM [APP-057]). To allow SCC to understand the need for this provision, SCC requests that the next draft of the EM is updated to include justification for this provision. It would also be helpful to know which buildings within SCC’s administrative area are proposed to be demolished.
202. **Article 7 (consent to transfer benefit of Order)** – this article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable.
203. **Article 10(2) (planning permission)** – this provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the applicant would confirm whether it has any specific planning permission or DCO in mind.
204. **Article 11(1) (street works)** – absent a suitable highways side agreement or protective provisions to protect SCC’s highways interests, SCC considers art.11(1) should be subject to the street authority’s consent.
205. The same point applies in respect of the following articles: 14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way).
206. **Article 11(2) (street works)** – Under several of the draft DCO’s articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that approval must not be “unreasonably withheld or delayed” and there is also a provision that it is deemed to be given after 28 days. In several cases this appears to be unprecedented in DCOs or not well preceded.
207. SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions

included there is no need to also say that the approvals must not be “unreasonably withheld or delayed”.

208. SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2)(a) and (b) (permanent stopping up of streets and public rights of way), 16(2), 16(5)(b) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 49(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).
209. **Article 11(3) (street works)** – provides that if a street authority fails to respond to an application for consent within 28 days of the application being made, that street authority is deemed to have given its consent.
210. While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented (For example: East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission’s Sea Link application and National Grid Interconnector Holdings Limited’s LionLink Interconnector application). A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.
211. Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.
212. SCC requests that 28 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping).
213. A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.
214. **Article 12(2)(d) (application of the permit schemes)** – this provision prohibits “the relevant street authority” from permitting certain works at a certain time but then says “local highway authority” may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term “local highway authority” is not used elsewhere in the dDCO (save in a single definition) and is not a defined term itself. In articles 12(3), (4) and (5) “the relevant highway authority” referred to and SCC wonders whether that term should also be

used (whether once or twice) in article 12(2)(d). SCC would welcome the applicant's explanation on this drafting point.

215. **Article 13(3) and (4) (application of the 1991 Act)** – SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).
216. **Article 16 (temporary closure of streets and public rights of way)** – by article 16(1), the undertaker may, “for any reasonable time” divert traffic from the street or public right of way; and prevent all persons from passing along the street or PROW. SCC would welcome more information as to what “a reasonable time” might be.
217. In addition, SCC considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.
218. **Article 16(5)(b) (temporary closure of streets and public rights of way)** – this provision refers to the street authority's ability to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 42(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for consistency and the avoidance of doubt, SCC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e.g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 16(2) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 49(2) (traffic regulation), and 50(4) (felling or lopping).
219. **Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily)** – SCC considers allowing the applicant seven years to issue ‘notices to treat’ or a ‘general vesting declaration’ to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position and SCC considers the usual position should be adopted here, especially since (per article 34(4)) that period will not be eaten into by any legal challenge to the decision to grant development consent for the project.
220. **Article 49(5) (traffic regulation)** – this provision refers to the “instrument” made under paragraph (1), (2) or (3) of article 49. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest a new article 49(13) to provide as follows –

“(13) A copy of the instrument referred to in paragraph (5) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority”.

221. **Article 50 (felling or lopping)** – SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this Article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: “...the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority” (paragraph 22.1).
222. Regarding “a plan to specifically identify the hedgerows to be removed”, while the applicant has prepared “trees and hedgerows to be removed and/or managed plans” it is not clear those plans apply to all hedgerows or important hedgerows to be removed and SCC would welcome clarification on this point.
223. Regarding consent, only trees “within or overhanging the extent of the public highway” (and not included in the “trees and hedgerows to be removed and/or managed plans”) are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might seek the amendment of this article to include a more general consent provision.
224. **Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(1) defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. Requirement 4 (construction management plans) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions (Section 120(2)(a) Planning Act 2008) and one of the six tests for conditions is precision (*Circular 11/95: Use of conditions in planning permission* (paragraph 14)). SCC consider the inclusion of “discharging authority” in requirement 4 creates imprecision and requests that the applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named.
225. **Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(4) needs to be amended as follows –
- “Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies “unless otherwise approved” or “unless otherwise agreed” by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement”.
226. This amendment is consistent with the drafting of the equivalent paragraph of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958).

227. **Schedule 3 (requirements) (requirement 3(1) (stages of authorised development))** – requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. This is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC’s experience of discharging requirements under that Order has shown the time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days.
228. **Schedule 3 (requirements) (requirement 3(2) and (3) (stages of authorised development))** – provides for notice of the commencement and completion of each stage to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for this information to be provided and considers it should be provided in 5 working days.
229. **Schedule 3 (requirements) (requirement 6(2) (archaeology))** – this provision names “the relevant planning authority” as the discharging authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedent. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.
230. **Schedule 3 (requirements) (requirement 7 (construction hours))** – this provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S.I.2022/432). Requirement 24 of that Order states the core hours are “between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays”, subject to certain exceptions listed in sub-paragraph (2). SCC’s proposed amendments to requirement 7 include the following.
231. Requirement 7(1) should be amended as follows –
- “Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and ~~08.00 07.00~~ and ~~13.00 17.00~~ on Saturdays, ~~Sundays, bank holidays and other public holidays (the core working hours)~~, unless otherwise approved by the relevant planning authority”.
232. 35. Requirement 7(2) should be amended as follows –
- “No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and ~~08.00 07.00~~ to ~~13.00 17.00~~ on Saturdays, unless otherwise approved by the relevant planning authority”.
233. 36. Requirement 7(3) should be amended as follows –

“Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 08.00 ~~0700~~ to 13.00 ~~1700~~ on Saturdays, unless otherwise approved by the relevant highway authority”.

234. 37. Requirement 7(4)(a) should be omitted.

235. 38. Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4.3.5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(3)(g) of the Bramford Order states –

“(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1)—

(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)”; [Words not included in the dDCO shown underlined].

236. SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.

237. Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4.3.5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(4) of the Bramford Order states –

“The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours”.

238. SCC considers the underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.

239. **Schedule 3 (requirements) (requirement 9(3) (reinstatement planting scheme))** – this provision states –

“Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority”.

240. The reference to “5 years” should be changed to “10 years”, which would provide greater ecological improvements.
241. **Schedule 4 (discharge of requirements) (paragraph 1, timescales)** – the timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in Advice Note Fifteen: drafting Development Consent Orders. The EM [APP-057] justifies the shorter timescales as follows –
- “Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from those recommended in Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. There is precedent for these time frames in the recently made National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. (paragraph 4.4.2).
242. This argument is unconvincing. The 28-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect “the immediate and pressing national need which the project is intended to address”.
243. While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, the Councils consider a 56-day decision-making period would be reasonable.
244. Paragraph 4.4.3 of the EM [APP-057] says this schedule is “identical to the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. It is not. The equivalent period in the Bramford Order is 35 days. SCC’s experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. More time, not less, is required here.
245. **Schedule 4 (discharge of requirements) (paragraph 3, fees)** – the fees proposed in paragraph 3(1) are unreasonably low and need to be increased. Moreover, paragraph 3(2) – which provides for the refund of fees in certain circumstances – is unreasonable and should be deleted.
246. **Schedule 17 (public general legislation)** – the disapplication of section 23 of the Land Drainage Act is not agreed, and neither are the protective provisions included at Part 3 (for the protection of drainage and flood authorities) of Schedule 16 (protective provisions) to the dDCO.
247. **Schedule 18 (amendment of local legislation)** – SCC requests copies of the Acts which affect their administrative area.

14. Public Health

Document 6.10, Environmental Statement Chapter 10 – Health and Wellbeing

248. The scope and extent of the baseline data, including ward level analysis and consideration of vulnerable groups, is thorough and indicates alignment with best practice as set out in national guidance (NPS EN-1, EN-5, IEMA, Wales Health Impact Assessment Support Unit (WHIASU) and Public Health England. The methodologies used for assessment are considered suitable by Public Health for the specific purpose of this project.
249. The assessment references the following policies and strategies:
- a. Paragraph 10.2.1 - National Policy Statement EN-1 and EN-5 (Department for Energy Security and Net Zero, 2024)
 - b. Paragraph 10.2.14 - National Planning Policy Framework (NPPF, 2025) and “accompanying” planning practice guidance.
 - c. Paragraph 10.2.14 - Environment Act 1995,
 - d. Paragraph 10.2.14 - Health and Social Care Act 2012
 - e. Table 10.1 - Local Health and Wellbeing Strategies (e.g. Norfolk, Essex, Thurrock, Babergh, Mid Suffolk) – though notably Suffolk Joint Local Health and Wellbeing Strategy 2022 – 2027 is absent.
 - f. Paragraph 10.2.17 - Guidance from IEMA (2017, 2022a, 2022b), WHIASU (2021), and Public Health England (2020, 2021), Mental Wellbeing Impact Assessment (MWIA).
250. Chapter 10 references a range of local and national datasets, however the coverage is not fully comprehensive as neither the Suffolk Office of Data & Analytics (SODA), the Suffolk Joint Local Health and Wellbeing Strategy 2022–2027 nor the Suffolk Joint Strategic Needs Assessment (JSNA) appear to have been considered. The Suffolk Health and Wellbeing Strategy is only briefly mentioned as a baseline source elsewhere in the chapter, with the JSNA referred to in the Bibliography only. These omissions suggest that important Suffolk specific data sources may not have been fully incorporated, potentially limiting the depth and relevance of the health and wellbeing evidence base for Suffolk. Notably, the Babergh and Mid Suffolk Health and Wellbeing Strategy is cited, but this is distinct from the Suffolk wide strategy.
251. The assessment methodology is presented as proportionate and indicates alignment with guidance from the Institute of Environmental Management and Assessment (IEMA) and the WHIASU. Stakeholder engagement with statutory consultees including Suffolk County Council and Norfolk County Council has been documented, and the use of the Mental Wellbeing Impact Assessment (MWIA) toolkit is welcomed. However, the Health and Wellbeing Chapter does not provide clear evidence of direct engagement with the wider community, parish councils, or vulnerable groups, nor does it critically evaluate the effectiveness, timing, or inclusivity of consultation activities. Public Health cannot therefore

confirm that effective community engagement has been fully achieved through review of the Health and Wellbeing Chapter alone.

252. Embedded and standard mitigation measures such as those that would be set out in the Code of Construction Practice (CoCP), Construction Traffic Management Plan (CTMP), and Public Rights of Way (PRoW) Management Plan, are acknowledged within Chapter 10, but they are not described in detail or specifically referenced within the chapter itself. Instead, the text indicates that these measures are defined and discussed in other Environmental Statement chapters and related documents. From a Public Health perspective, it is considered good practice for the Health and Wellbeing chapter to include clear examples of relevant mitigation measures, particularly those that directly address health related impacts. Quoting or summarising key mitigation actions within the chapter would improve transparency and allow stakeholders to better assess the adequacy and appropriateness of the proposed measures in relation to health and wellbeing outcomes.
253. In accordance with the principles set out in Suffolk County Council's Community Engagement and Wellbeing Supplementary Guidance Document (SGD), further detail is required on:
- a. The monitoring of health and wellbeing outcomes, including mental health, physical activity, and access to services, using baseline data such as Suffolk's Emotional Needs Audit and Key Performance Indicators for engagement and wellbeing.
 - b. The process for reviewing and updating mitigation measures in response to community feedback and emerging evidence, with participatory monitoring and adaptive management.
 - c. The role of Public Health and local authorities in ongoing scrutiny and engagement, including the expectation for continuous, honest, and collaborative engagement with communities and parish councils.
 - d. Consideration of appointing an independent relationship manager to act as a consistent, impartial point of contact for communities, building trust and reducing negative impacts on wellbeing.
254. The proposals involve substantial electrical infrastructure with associated Electric and Magnetic Fields (EMFs). The Chapter explains the project is designed in accordance with National Grid design standards, complies with guidelines and policies related to EMF as stated in NPS EN-5 (DESNZ, 2024b), including the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines (ICNIRP, 1998). The Chapter further clarifies compliance means the project will already have designed out potential effects from EMF to a level appropriate to meet health and safety standards, including precautionary measures. However, it is important to specifically acknowledge that anxieties and perceptions around EMFs can have real and measurable impacts on mental wellbeing. The Chapter recognises that such concerns may link to anxiety (paragraph 10.7.136). The Applicant has committed to providing clear, accessible information and ongoing local engagement generally, including a dedicated

website, helpline, and specialist support at consultation events, to help address concerns.

255. **Recommendation:** To fully address the potential mental health impacts associated with EMF perceptions, further detail should be provided on the delivery of mental health mitigation. This should include local education programmes, targeted community engagement, and the monitoring of mental health outcomes during both construction and operation.
256. The Chapter outlines measures for informing residents and businesses about construction impacts, traffic management, and mitigation, including regular updates, contact points, and complaints procedures as set out in the Outline Code of Construction Practice. The Chapter refers to legal compliance and a multi-channel approach, but does not itself evidence compliance. Instead it points to the Consultation Report and Policy Compliance Document for full details.
257. The Environmental Statement acknowledges in Table 10.4 that *“During construction there would be disruption to recreational routes or areas of open space which may affect opportunities for physical activity. During the operation (and maintenance) phase, access to recreational routes would be reinstated and no effects are anticipated in relation to physical activity”* (Table 10.4). Use of the term “no effects are anticipated” should be carefully scrutinised in each case, as even temporary or localised disruptions to PRowS can have a disproportionate impact on physical activity, social connectedness, and mental wellbeing, particularly for vulnerable groups.
258. The chapter notes in Paragraph 10.7.87 that *“The majority of PRowS would be affected for short durations only and the strategy is aimed at maintaining them as open Rights of Way throughout the construction period, wherever practicable”*. From a public health perspective, it is essential that all reasonable effort is made to ensure that these “short durations” are minimised as far as possible, and that *“wherever practicable”* is interpreted robustly, so that the right to access and use PRowS is preserved for the community.
259. A significant adverse effect from construction traffic noise has been identified at Bentley Road (PAR 30), with a predicted increase of 11.4 dB, exceeding the Significant Observed Adverse Effect Level (SOAEL). The Outline Construction Traffic Management Plan proposes mitigation measures and whilst these measures may help reduce noise, the Environmental Statement acknowledges in 14.7.36 that *“major significant adverse effects from construction traffic noise would still be expected on Bentley Road”*. From a Public Health perspective, it is essential to recognise that the proposed mitigation may not be sufficient to prevent significant adverse impacts on residents’ health and wellbeing. It is recommended that the applicant explores further site-specific mitigation options, this should include ongoing engagement with affected residents and robust monitoring.

Document 6.17, Environmental Statement Chapter 17 – Cumulative Effects

260. The cumulative effects of multiple infrastructure projects in the same locality can result in significant adverse impacts on community wellbeing, including increased anxiety, loss of control, and emotional distress, as identified in the Suffolk County Council's Community Engagement and Wellbeing SGD. The chapter goes some way to recognise this in Paragraph 17.5.47: *"In a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases."* These impacts may not be fully captured by the EIA process and require mitigation through early, continuous, and collaborative engagement, as well as support for community leaders and volunteers.
261. Table 17.3 acknowledged that for some groups, the cumulative effect of noise, visual, and access impacts is considered significant: *"Owing to the significance of visual effects within 500 m of the Order Limits, and as further mitigation is unlikely to be practicable, it is anticipated that the residual cumulative effect of visual and noise amenity effects with access and delay effects would lead to a significant intra-project cumulative effect on pedestrians, cyclists and horse riders. However, the significant effects are no greater than reported in Chapter 13: Landscape and Visual".* No additional mitigation measures are proposed within the chapter beyond those already identified in the other topic chapters.
262. **Recommendation:** Given that the chapter concludes further mitigation is *"unlikely to be practicable,"* it is recommended that the Applicant continues to engage proactively with affected communities, particularly those within 500 m of the Order Limits to monitor the real world impacts on pedestrians, cyclists, and horse riders. The Applicant should remain open to implementing targeted, site-specific measures or enhancements if significant adverse effects are observed during construction or operation, even if these go beyond standard mitigation.
263. The assessment concludes that inter-project cumulative effects on health and wellbeing are not significant during both construction and operation phases. This conclusion is based on the assumption that other developments will implement best practicable means (BPM) and standard mitigation measures.
264. Paragraph 17.4.22 explains that *"No monitoring is proposed during construction or operation (and maintenance)."* This appears a notable gap given the potential for significant combined impacts on physical activity, mental wellbeing, and community amenity:
265. **Recommendation:** Public Health recommend targeted monitoring of health and wellbeing outcomes for affected communities is undertaken, especially where significant cumulative effects are identified. Processes should be put in place and documented to communicate and engage with users of PRow's, schools, and community facilities to ensure timely information about closures, diversions, and mitigation measures. Additionally The Applicant should proactively distribute mental health resources (e.g. WellMinds <https://simplebooklet.com/wellmindssuffolk#page=1>) provide funded Mental Health First Aid training for community members, and support local mental health

organisations to mentor volunteers, as recommended in the Suffolk County Council Community Engagement and Wellbeing SGD.

266. Sensitivity testing as detailed within Paragraph 17.6.4 indicates that delays or extensions to the construction programme would not result in new or different significant inter-project cumulative effects.
267. **Recommendation:** Public Health recommend the applicant maintain flexibility in mitigation and monitoring plans to respond to unforeseen cumulative impacts, especially if construction timelines or project overlaps change.

Document 6.4 Project Description

268. It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity.
269. The applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi-rural locations close to the works.
270. **Recommendation:** Core working hours be reduced to more typical levels with no routine working on Sundays or bank holidays, except where essential for safety or agreed with affected residents. Night working be strictly limited to essential activities only, with advance notice, robust justification, and additional mitigation for affected receptors. Start-up and close-down activities be included within the core hours, not permitted outside them. The applicant be required to consult with affected communities and local authorities before agreeing any variations to working hours or mitigation measures.

Document 6.14 Environmental Statement Chapter 14 - Noise and Vibration

271. The Chapter identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level (SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily due to compaction activities associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant. There does however appear to be any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan or the Environmental Statement. From a Public Health perspective, whilst the use of BPM is welcomed, it is recommended that the applicant provides greater clarity on how vibration impacts will be monitored and mitigated during construction.

15. Public Rights of Way

272. The proposed new pylon route significantly affects the public rights of way (PROW) network during the construction phase due to this SCC strongly advocates this is dealt with within its own chapter. It is therefore covered in health and well-being chapter; landscape and visual chapter; social economics, recreation and tourism and transport and traffic chapter. As a result, the post methodology's do not recognise the importance of the quality of the experience enjoyed by the public when going for a walk or ride. SCC does welcome the Draft PROW Management Plan but would like all the other aspects to be covered off or repeated in a dedicated PROW chapter, or in a subsection of the Traffic and Transport section.
273. The PROW Management Plan should be a standalone document.
274. Section 15 covers receptors and some long-distance trails, some notable circular walks have been omitted and need to be referenced and assessed, using the 'Discover Suffolk website' routes affected are and not limited to:
- a. Great Bricett Moat & Pub Walk,
 - b. Great Bricett Airfield & Hall Walk,
 - c. Bramford Mills and Meadows Walk.
275. SCC has concerns about the impact of multiple National Grid projects particularly within the Bramford area and the long-term impact on restrictions on the rights of way network. The combination of projects could see closures for significant lengths of time effectively severing the network and creating long term disruption to PROW users. Although the closures are not permanent, this will impact on access and thus on the health and well-being of the local community over a lengthy period. SCC considers that appropriate mitigation for these residual impacts is required.
276. Several promoted long-distance routes will be affected by the proposal covering the Stour Valley Path, Gipping Valley Footpath and Mid Suffolk Footpath and connecting promoted circular routes, in addition to local strategic routes close to villages. These routes need to be monitored during construction of the line and usage of haul roads, to identify impacts and where required further mitigate. This should also cover the increase in construction traffic on minor routes close to villages that are also used for non-motorised access to the PROW network. SCC are happy to provide details of specific areas of known medium to high use that should be included in further surveying. This comment carries over from previous correspondence and should also be addressed in the Public Rights of Way Management Plan (PROW MP), which has not been attached to the submission documents but referred to as document 7.6.
277. SCC also expects mitigation measures for the impact on the popular sections of the rights of way to offset the disruption to local communities. Consideration needs to be given to whether temporary infrastructure can assist as legacy for PROW access as a permanent measure once completion of the scheme, including any proposed structures. Further discussion would be welcomed on this.

278. Further details would be welcomed on treatment of routes and proposals for closures.

Additional general comments

279. A pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with SCC as Highway Authority. This should include pre-construction work where PRow might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles. Pre and post condition surveys are covered in 2.2.4 and will be required and agreed by SCC PRow and adequately covered and agreed in the PRow MP.
- a. Where impacted by the works, any PRow will be restored to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with the SCC, and this should be included within a Code of Construction Practise. This is referred to in 2.2.4 of the Draft PRow Management Strategy and adequately covered and agreed in the PRow MP.
 - b. Where PRow cross the cable corridor, haul road, access tracks and other sites, the surface must be kept in a safe and fit condition at all times for all users. Management measures should be included within the Construction Traffic Management Plan and adequately covered and agreed in the PRow MP.
 - c. Pre-construction works must not obstruct or disturb any public rights of way (e.g. new fencing, archaeology surveys etc) unless otherwise agreed with SCC. Management measures should be discussed, and any temporary closures will need to be included in the DCO and adequately covered and agreed in the PRow MP.
 - d. Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to use at all times with management measures put in place with the agreement of SCC.
 - e. Any temporary closure of a PRow must be agreed with SCC and the duration kept to the minimum necessary, this must be included within the DCO.
 - f. An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure. The location of alternative routes to be agreed with SCC and adequately covered and agreed in the PRow MP. The path or way must not be substantially less convenient to the public in consequence of the diversion.
 - g. Any alternative route must be safe and fit for the public to use at all times – suitable surface, gradient and distance with no additional road walking between the natural destination points. Any diversion route surface, width and gradient should be at least commensurate with the existing route. Any routes which divert onto a road, which does not currently emerge onto a

road, should have an Road Safety Audit undertaken to ensure that it is safe for all users.

- h. Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route. The closure and alternative should be signed accordingly and SCC PRoW informed prior to closure. Also, the path or way must not be substantially less convenient to the public in consequence of the diversion

There should be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.

Document: 6.15 Environmental Statement Chapter 15 - Socioeconomics

- 280. Recreation and Tourism, Table 15.24, p88: W-129/025/0 is marked as significant in the construction phase, but still marked as low in sensitivity, what mitigation is proposed to lessen the significant impact?

Document: 6.16 Environmental Statement Chapter 16 - Traffic and Transport

- 281. 16.4.15 Refers to PRoW surveys and states that PRoW officers agreed the scoping. This is not totally correct, as SCC PRoW did not agree locations, or days, or months prior to the survey being undertaken. When we were approached after the surveys, we advised that it needed to be at least three days and in holiday season as well as school time and we needed locations of where the surveys were to be undertaken and the methodology behind the locations, along with the method of collection, as permissions should be sought on PRoWs.
- 282. 16.4.31 Refers to the dates the surveys were taken and noted that the PRoW users would be higher in spring/summer months when the weather is more favourable and daylight hours are greater. This is agreed and SCC PRoW would request more accurate surveys to be undertaken.
- 283. SCC recommend altering the following statement:

S02: PRoWs crossing the working areas will be managed in discussion with the relevant Local Planning Authorities and SCC PRoW team and potential temporary closures and diversions applied, where required. Road closures and diversions will be kept as brief as possible, , with alternative routes maintained where practicable. Access disruption would be reduced while construction activities occur where practicable. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. This should be in prior discussion with SCC PROW with regards to dates, timeframes, routes and signage.

16. Suffolk County Council Planning

- 284. SCC is the Minerals and Waste Planning Authority in Suffolk. The proposed development does not directly impact existing or proposed minerals and waste development. In terms of minerals safeguarding, the sand and gravel resources within Suffolk are of at most regional importance as opposed to these proposals which are of national significance.

285. SCC also determines planning applications for its own development including new schools and highways improvements. There are no known conflicts at the time of writing.
286. SCC has at the request of Councillors through the course of the evolution of these proposals sought to safeguard aviation interests. This work has included help facilitate discussions between NGET and the Civil Aviation Authority and attending meetings convened by the General Aviation Awareness Council and airfield operators. SCC will continue to support in particular Raydon Airfield which is still considered to be adversely affected.
287. SCC welcomes the Community Benefit funds payable to communities in the vicinity of transmission infrastructure and asks that it is consulted as part of that process.
288. SCC supports additional financially based side agreements with NGET to offset or compensate for the potential impacts of these proposals including:
 - a. a legal agreement to supply funding to the Dedham Vale National Landscape Project to enable works identified the current Management Plan in order to further the purposes of the National Landscape in accordance with Section 85 of the Countryside and Rights of Way Act 2000 and to offset the impact of undergrounding through the Dedham Vale National Landscape;
 - b. a legal agreement to facilitate a feasibility study of the potential removal of the existing 132kV overhead line which runs between the existing Bramford and Lawford substations to offset the impact of undergrounding through the Dedham Vale National Landscape;
 - c. a legal agreement to supply funding to the Suffolk Wildlife Trust to enable works in accordance with the Waveney and Little Ouse Landscape Project to offset the impact the proposed pylons which will bisect the Waveney Valley;
 - d. a legal agreement to supply funding to the relevant Councils to support compensatory tree planting in lieu of the loss of existing trees along the route of the proposed development.
 - e. a legal agreement to support the monitoring of Biodiversity Net Gain for a period of 30 years.