

1. **Colchester City Council’s Response to a statutory consultation in accordance with sections 42, 44, 47 and 48 of the Planning Act 2008 (the “Act”) for the project called Norwich to Tilbury (“the Project”).**
2. Thank you for consulting Colchester City Council on this Statutory Consultation for your Project. This response comprises the Council’s formal response to the Statutory Consultation.
3. **CCC’s objection to the strategic proposal for Norwich to Tilbury**
4. Colchester City Council (including it’s elected Members who have had a significant input in to the following response) together with Essex County Council consider that there is insufficient information in the 2024 statutory consultation documents to be certain about how much additional electricity transmission capacity is required in the south east, and by what date, to fully evidence a strategic proposal that relies on onshore reinforcement technology, which includes the construction of overhead lines (OHL) and pylons, and a programme delivery date of 2030. CCC must therefore maintain it’s in-principle objection to Norwich to Tilbury on the following grounds, which are discussed in more detail below:
5. **Object to the lack of evidence provided by National Grid Energy Transmission (NGET) to support the need and timing of Norwich to Tilbury by 2030.**
6. **Object to NGET undertaking an accelerated programme of consultation to meet an uncertain 2030 programme delivery date on what CCC considers to be a predetermined strategic proposal and 2024 preferred route using predominately harmful onshore overhead line (OHL) and**

**pylon technology, and prior to the conclusion of the Offshore Coordination Support Scheme (OCSS) and conscious consideration of ESO East Anglia Study Report (March 2024).**

7. CCC welcomed further information that supported greater transparency on the assessment of need for additional electricity transmission capacity in the east, and the appraisal of strategic options to meet this need was provided in the Design Development Report (June 2023) and Strategic Options Back Check and Review (June 2023). CCC understands that this work was undertaken by NGET prior to the first round of non-statutory consultation in 2022 and informed by National Grid Electricity Systems Operator's (ESO) assessment of future transmission requirements and network capability, as detailed in the 10 Year Electricity Statement 2022 and refreshed Network Option Assessment 2021/22 (NOA). CCC notes in paragraph 4.2.5 of the Design Development Report (April 2024) that the Strategic Options Back Check and Review (April 2024) remains materially unchanged from the 2023 iteration.
8. CCC maintain that there are significant uncertainties and sensitivities concerning the need and timing of Norwich to Tilbury that would have been evident to NGET and ESO during the appraisal of strategic options and choice of strategic proposal in 2022, and that these still remain in 2024. This is a position is further supported by Hiorns Smart Energy Network Report (November 2023) and the ESO's East Anglia Study Report (March 2024).
9. In considering its in principle objection to Norwich to Tilbury, CCC accepts that NGET has reviewed the strategic proposal and 2024 preferred route against the new national policy statements for energy that were published in November 2023, and its existing connection contracts. CCC understands that NGET has contracts with offshore wind developers at North Falls and Five Estuaries, and with Tarchon Energy for an interconnector with Germany that require connection at the proposed new East Anglia Connection Node substation in Tendring by 2030. CCC do not consider that NGET have provided any new evidence in its 2024 statutory consultation to refute the conclusion of the Hiorns Report that Norwich to Tilbury is not needed by 2030. CCC would also continue to challenge ESO's assumption that 100% of contracted projects in the south east will be successfully awarded Contract for Difference and require connection to the network by this date.
10. However, it is not clear beyond the existence of these contracts why Norwich to Tilbury was included in the government's Accelerated Strategic

Transmission Investment (ASTI), which then made it out of scope for Holistic Network Design (HND) as part of the Offshore Transmission Network Review (OTNR). CCC remains concerned that Norwich to Tilbury has been scoped out of HND and into the OTNR Early Opportunities workstream without reasonable justification. CCC can find no mention of this issue in the 2024 statutory consultation, despite it being raised in the previous 2<sup>nd</sup> round of non-statutory consultation.

11. CCC are concerned that NGET have proceeded with statutory consultation on a strategic proposal and 2024 preferred route for Norwich to Tilbury prior to any meaningful outcome from the Offshore Coordination Support Scheme (OCSS), which includes the proposed offshore wind developments at North Falls and Five Estuaries. There is very little information available on Early Opportunities, including the OCSS, but CCC is aware how complex contractually the coordination of North Falls, Five Estuaries and Sea Link would be. Nevertheless, in the absence of any meaningful output from OCSS being available, CCC can only conclude that NGET cannot have conscientiously considered the ESO's East Anglia Study Report (March 2024).
12. It remains unclear how ESO can be considering network options for electricity transmission in the south east that are based on the premise that OCSS will conclude with the successful coordination of North Falls and Five Estuaries connecting into the proposed offshore electricity transmission infrastructure provided by Sea Link, whilst in parallel NGET are continuing with promoting a network option and preferred route for onshore electricity transmission infrastructure in the south east that it argues is needed to support connection contracts with North Falls and Five Estuaries by 2030. This further adds to the concerns of CCC that the strategic option and choice of strategic proposal has been predetermined and will remain an example of the uncoordinated and inefficient approach to energy transmission that the government accepts requires urgent improvement and is currently reviewing.
13. **CCC wishes to reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include OHLs and pylons.**
14. **If an offshore approach is not possible an onshore HVDC fully undergrounded approach as is set out in the ESO East Anglia Study**

**Report (2024) should be the next option tabled as it is clearly less visually damaging than the tabled scheme.**

15. CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security.
16. If the strategic proposal for Norwich to Tilbury were to retain the current onshore option, CCC considers that further assessment and likely significant changes are required as noted in the main body of the report below.
17. The 2024 consultation contains very little information on how NGET will ensure that benefits from Norwich to Tilbury, both direct and indirect, are maximised from all possible sources. CCC expects the vital role that Essex and its local communities are expected to have in hosting nationally significant onshore transmission infrastructure, which supports the delivery of cheaper, more secure, and low carbon energy generation, to be recognised. Material and demonstrable benefits in mitigation need to be provided for the host communities.
18. Removal of the proposed East Anglian Connection Node (EACN) Substation
19. The OCCS would potentially remove the need for the EACN. The recent ESO East Anglia Network Study report of March 2024 contained a number of options that did not require the EACN – for example option 5b. None of the options were cut and dry ‘winners’ and none had the limited impact of an entirely offshore proposal, but they demonstrate that there are alternative options that are workable that do not require the impact on our neighbours at Tendring District Council (TDC) and on the CCC area that any proposal with the EACN would have.
20. An option that removes the EACN would be very much supported from CCC’s point of view as it is the EACN that results in an alignment that impacts upon the Dedham Vale National Landscape (formerly AONB). The Council’s position is that the removal of the EACN should be prioritised. CCC note a sense of the Norwich to Tilbury scheme sleepwalking into a DCO that contains the EACN which in turn will ensure it happens, whereas there appears to be ample scope for offshore windfarm coordination that may potentially remove the need for it.
21. That leaves Tarchon. It is unclear as to whether the Tarchon interconnector will ever transpire regardless of its Holland Haven landing area licence. The Tarchon interconnector does not have a DCO for landfall nor for cabling

across the TDC area. Whilst further along the process, neither do the North Falls or Five Estuaries Windfarms.

22. This adds further weight to CCC's opinion that an alignment that removed the EACN should be prioritised.

23. The Alignment to/from the EACN

24. Notwithstanding CCC's position that it should be removed, in the event that the EACN remains, the Council strongly recommends the undergrounding of the section between the EACN and what is currently the position of the Great Horkesley Cable Sealing End Compound (CSEC).

25. It appears perverse to take underground cables into the EACN from the Dedham Vale National Landscape on the way into the EACN, only to then erect pylons above the trenched cables on the way out of the EACN, to then trench the cables at Great Horkesley.

26. This approach results in the destruction associated with the construction of the trenched section, without the visual amenity benefits as pylons and then introduced above ground.

27. CCC acknowledges that part of this section occurs in neighbouring Tendring District Council but see no obvious disadvantage to a 'trench into EACN/trench out of EACN' strategy, even if this widens the construction swathe somewhat.

28. This matter is addressed in the Design Development Document at 5.4.121 where you state:

29. *Feedback from various respondents requested the proposed overhead line be replaced by the use of underground cable between the EACN substation and the Great Horkesley underground cable section. This area is not subject to designations that change the presumed general acceptability of overhead lines (as set out in EN-5) although the overhead alignment is relatively close to the Dedham Vale Natural Landscape (AONB). However, whilst potentially visible from locations within the AONB it is not considered that this would lead to effects that would justify, in policy terms, the very substantial additional costs and environmental effects arising from the installation of underground cable.*

30. CCC does not concur with this approach and considers that even if the additional cost is substantial, it is a price worth paying, noting that it would negate the need for the Great Horkesley CSEC in its entirety and the environmental and visual benefits that brings. Material harm to the designation occurs from development within its setting and not simply from

development within the designated area. This harm must be avoided by undergrounding.

31. Underground through the Colne Valley

32. CCC's position is that the area from West Bergholt, past Fordham and Aldham and into Marks Tey and Great Tey must be undergrounded for landscape reasons across the Colne Valley and neighbouring amenity reasons in Aldham, in particular. CCC's position is that the Colne Valley is a landscape of exceptional quality and value. The Council's position is that it would be proportional given the scale of the evidenced harms, for **NGET to commission a Valued Landscape Assessment of the Colne Valley. CCC need to be involved in defining the scope a such a document to ensure its validity.** The reasons for this will be set out in the Landscape section of the Council's response to the PEIR below. **Despite the scale of the project, it does not appear as though the effects of the Project on national or regional landscape character have been assessed and this is a flawed approach.**

33. The Policy Context and NPS EN-5

34. National Policy Statement for Electricity Networks (EN-5) provides the detailed policy background to schemes such as this.

35. CCC consider that the point noted above are supported in policy terms within the NPS. NPS EN-5 at section 2.9.12 sets a very strong threshold for acceptable damage stating that "in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty). It states that

36. ***"even residual impacts may well make an overhead line proposal unacceptable in planning terms"***.

37. NPS EN-5 at section 2.9.20 goes on to detail the requirements ***within*** the National Landscape, stating that:

38. "Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)."

39. Paragraph 2.9.21 clearly extends this requirement to infrastructure outside of the National Landscape which nevertheless impact the National Landscape:
40. **“In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re- routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.”**
41. The ‘and’ is not intended to be restrictive and that results in the need for undergrounding within and outside of a National Landscape where the overgrounding has an impact on the National Landscape. The NPS would simply state ‘in these areas’ if the NPS only required the presumption for undergrounding to be within the geographical boundaries of the National Landscape. The ‘and where harm’ would be redundant.
42. This is further emphasised by the clear reference to the residual impacts of overhead infrastructure cited in paragraph 2.9.12 which must be outside of the National Landscape given that pursuant to 2.9.20 they cannot possibly be within the National Landscape. The value and visual importance of the National Landscape can manifestly be impacted by infrastructure that sits outside of the area of designation, as well as that within it.
43. EN-5 Paragraph 2.9.22 details the exemptions to the presumption to undergrounding which applies in paragraphs 2.9.20 and 2.9.21 and there are only two, those being:
44. “where it is infeasible in engineering terms”; and
45. ”where the harm that it causes is not outweighed by its corresponding landscape, visual amenity, and natural beauty benefits”.
46. Regarding harm, for NGET to rely on this exemption it would be required to demonstrate that the damage caused by underground cables outside of the designated landscape was greater than the benefit to landscape interests within the designated landscape. CCC consider that in this instance that is very clearly not the case. On the contrary the benefit of undergrounding would convincingly outweigh the harm.
47. It is important to note that cost considerations are not referenced in relation to National Landscapes and their setting. In EN5 cost is only considered in respect of mitigating factors in the context of additional cases where “no part of the proposed development crosses a designated landscape” (National Policy Statement for Electricity Networks Infrastructure, 2.9.23) which is plainly not the case here.

48. It is worth noting that requirements are different from those in force at the time of the proposed developments inception which represent a deliberate change by Government strengthening the previous draft dated September 2021. CCC are concerned that NGET have not given due consideration to this very intentional change.
49. CCC noted that NGET wrongly state that the sections near to the National Landscape are not subject to the presumption to undergrounding at 5.4.121 of the Design Development Report.
50. As set out in the relevant section of the PEIR and LVIA and discussed in the Landscape section of CCC's response below the scheme would demonstrably harm the setting of the National Landscape. It must be noted that EN-5 2.9.12, "**even residual impacts**" would make the present proposals unacceptable.
51. CCC do not consider that the proposals complies with NPS-EN5 in this regard. We argue that the entire section of line from Ardleigh to Fordham is subject to the presumption to undergrounding, even residual impacts are unacceptable and in sections which cross and impact a National Landscape it is clear that cost cannot be argued as a reason not to underground.
52. The proposed development should therefore be significantly amended in order to bring it into line with the requirements of National Policy. Above ground equipment must not be situated in any position which causes even residual impact to National Landscapes and therefore proper application of EN-5 prevents the use of above ground infrastructure near to the Dedham Vale and requires cables to be underground throughout the section from Ardleigh to Fordham to protect the Dedham Vale and Stour valley Project. CCC consider that the PEIR and supporting documentation have wrongly interpreted the requirements of the National Policy Statement. In conclusion **EN5 requires use of undergrounding both near to and within the National Landscape, making it clear that even residual impacts are unacceptable, and precludes arguments based on cost to avoid undergrounding near to a protected National Landscape.**
53. The Need for additional consultation
54. The Council will set out its thoughts on the PIER below, however a running theme throughout is the significant amount of information that is missing from it which in turn has been justified as 'this will be provided in the Environmental Statement (ES)'. In short numerous topics will be bolstered at ES stage. This undermines the usefulness of the Statutory Consultation as a tool for a genuine consultation.



55. It is therefore requested that once this additional information (which will be noted on a thematic basis below) is derived from the additional survey work that is currently ongoing and will continue to be ongoing throughout the rest of 2024, then a further additional statutory consultation is undertaken to enable a useful response from LPA's.

56. **The Preliminary Environmental Impact Report (PEIR)**

57. **Agriculture and Soils**

58. The Council will defer to both Natural England/DEFRA and Essex County Council's Minerals Team for Agriculture and Soils matters.

59. The Council does wish to note that with regards to Best and Most Versatile Agricultural (BMV) Land; the Council acknowledges the limited negative impacts upon BMV land so long as appropriate soil handling techniques are guaranteed.

60. **Air Quality**

61. Tim Simpson of Chelmsford City Council has assessed the PEIR on behalf for CCC and he has advised that the air quality impact assessment sets out that it will be necessary for the applicant to develop and implement a dust management plan for the construction related activities. However, for construction traffic the impact has been predicted to be negligible and as such, no mitigation measures are required.

62. **Ecology and Biodiversity**

63. Places Services Ecology have advised the Council on Ecology matters and the comments relevant to the CCC area are set out below.

64. The following comments relate to the PEIR Volume 1 - Main Text, PEIR Volume 3 - Technical Appendices (Parts 1 and 2 of 4), and associated PEIR Volume 2 – Figures.

<p><b>Volume 1, Chapter 4 Project Description; Para 4.8.18</b></p>	<p><b>RE: Vegetation clearance for overhead lines</b></p> <p><b>We note that where the 400kV overhead line will require vegetation removal, a 40m wide swathe will be removed to facilitate construction activities. We assume the sections would be felled to ground level with no removal of roots.</b></p> <p><b>We understand an additional up to 8m of vegetation either side of the 40m would be managed during construction, operation, and maintenance, to allow for clearance to be maintained and an additional up to 22m of vegetation either</b></p>
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	<p><b>side would potentially be affected,</b></p> <p><b>This will result in a potential impact corridor of 100m width which should be reduced wherever possible. We seek reassurance that the mitigation hierarchy will be rigorously applied to avoid impacts before needing to consider mitigation and compensation.</b></p>
<p><b>Volume 1, Chapter 4 Project Description; Paras 4.8.34-35, 4.8.39-40</b></p>	<p>RE: Vegetation clearance for underground cabling</p> <p><i>Standard open-cut installation:</i></p> <p>We understand that, generally, a 120 m wide swathe of vegetation will be removed, although up to 50 m of vegetation either side of this would potentially be affected during construction.</p> <p>We welcome that soil will not be stored over hedgerows and that hedgerows would be replanted post construction.</p> <p>In total, we note that the impact corridor will be 220m width.</p> <p><i>Trenchless installation</i></p> <p>We understand a permanent easement of about 180m wide will be required, plus a construction corridor 200m wide and the impacts will vary with different activities.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Para 8.5.6, Table 8.3</b></p>	<p>RE: Site visits and surveys</p> <p>We understand the following surveys for habitats, European Protected Species and protected species are due to take place in 2024:</p> <p>Habitats (including Phase 1, UK Habitat Classification, River Condition Assessment, Hedgerow Regs Assessments and NVC surveys).</p> <p>Terrestrial invertebrates</p> <p>Aquatic ecology</p> <p>Reptiles</p> <p>Breeding birds (including Barn Owl assessment)</p> <p>Wintering birds</p> <p>Bats</p> <p>Badger</p>

	<p>Hazel dormouse</p> <p>Otter and water vole</p> <p>We await the results which need to inform the mitigation hierarchy and support the Statement of Common Ground with the LPAs. We highlight that surveys for Priority species likely to be present and affected may also be needed. This is necessary for the LPAs and Sec of State to demonstrate their strengthened biodiversity duty under s40 NERC Act as amended.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Para 8.5.21-30</b></p>	<p>RE: Biodiversity Net Gain (BNG)</p> <p>We note that the Project is committed to delivering a minimum of 10% BNG – for area habitats, hedgerows, and watercourses. The biodiversity unit calculations will be made using the Statutory Biodiversity Metric and presumably by adhering to all trading rules. However, we note that, at present, the project is indicating there will be a -6% BNG for area habitat units. We expect that the mandatory 10% BNG will be achieved through off-site measures. The Biodiversity Gain Hierarchy should be applied where possible.</p> <p>We also highlight that to meet the aspiration of NPS EN-5, the long-term maintenance and aftercare of mitigation planting will need to be for the appropriate timescales for delivery of the promised BNG condition and to secure the integrity and benefit of these schemes. We ask that details of the 10% Environmental, Net Gain is also detailed to meet the requirements set by OffGem.</p>
<p><b>Volume 3, Technical Appendices - Part 2 of 4; Appendix 8.10</b></p>	<p>RE: Non-significant impacts to protected and Priority species and habitats, and appropriate mitigation and compensation measures</p> <p>We highlight that all non-significant effects on Priority species and habitats will need to be identified in the ES, so that all the LPAs and Sec of State can demonstrate their strengthened Section 40 biodiversity duty under the NERC Act 2006 (as amended).</p> <p>‘Notable’ has a very specific definition which does not match the status of Priority species (aka Species of Principal Importance), so any use of ‘notable species’ needs to be clarified in the glossary to avoid being confusing.</p>

65. Place Services has reviewed the PEIR Volume 1 - Main Text, PEIR Volume 3

- Technical Appendices (Parts 1 and 2 of 4), and associated PEIR Volume 2 – Figures.

66. Ecology Comments re: PEIR (Colchester)

<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Table 8.4; Figure 8.1, MAGIC Maps</b></p>	<p><b>RE: SAC / SPA / Ramsar</b></p> <p><b>The document states designated sites within 30km of the project were included within the assessment. The nearest Habitats sites to Section C and D are:</b></p> <p>Stour &amp; Orwell Estuaries SPA and Ramsar site (3.07km from site). Cited for supporting internationally and nationally important numbers of numerous species of wintering wildfowl and waders. Also supports several nationally scarce plants and invertebrates. As these Habitats sites are hydrologically connected to the draft Order Limits, an HRA is expected. It should be noted that this designation falls within the Tendring District but could be affected by works carried out within the Colchester District.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Table 8.5, Figure 8.1</b></p>	<p>RE: SSSIs</p> <p>All SSSIs are provided a buffer, but Marks Tey Brickpit SSSI is only 0.04km from the draft Order Limits. The Marks Tey Brickpit designation is not based on ecological grounds. However, the SSSI boundaries also contain the Marks Tey Brick Pit Local Wildlife Site (Co31).</p> <p>The SSSI is cited for its uniquely important Pleistocene sediments, which have yielded a continuous pollen record through the entire Hoxnian Interglacial. No other site in the British Isles has so far produced a comparable vegetational record for this or any other interglacial. Of considerable interest also are the laminations (seasonal layers) within these lacustrine (lake) sediments which have made it possible to estimate the duration in years of the Hoxnian Interglacial.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp;</b></p>	<p>RE: LNRs</p> <p>We note no Local Nature Reserves are anticipated to be impacted by the works situated in the Colchester Borough.</p>

<p><b>Biodiversity; Table 8.7, Figure 8.1</b></p>	
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Table 8.9, Figure 8.2</b></p>	<p>RE: Non-statutory designated sites (CWSs/LWSs)</p> <p>We highlight that there are five CWSs/LWSs that have potential for direct impacts by virtue of overlapping borders with the draft Order Limits. Another 22 CWSs/LWSs have potential for indirect impacts:</p> <p>Section C</p> <p>Black Brook (Co136) – Directly Impacted The Coombs (Co157) – Directly Impacted Gun Hill Place (Co156) St Mary's Churchyard, Langham Hall (Co153) Gun Hill Grassland (Co155) Langham SRV (Co145) Birch Wood, Langham (Co151) Dalethorpe Park (Co162) Bridges Farm (Co163) Dedham Old River Marshes (Co167)</p> <p>Section D</p> <p>Fiddler's Wood (Co43) – Directly Impacted Harrow Wood (Co105) - Directly Impacted Stonefield Strip (Co27) - Directly Impacted Church House Wood (Co30) Aldham Hall Wood (Co35) Wood near Fordham Place (Co61) Fordham Bridge Meadow (Co45) Marks Tey Brickpit (Co31) Little Tey Churchyard (Co14)</p>

	<p>Langham Road Grassland (Co115)</p> <p>Kiln Wood (Co133)</p> <p>Fordham Churchyard (Co40)</p> <p>West Bergholt Alderwoods (Co65)</p> <p>Hillhouse Wood (Co63)</p> <p>Aldercar Wood (Co173)</p> <p>Stitching Wood (Co70)</p> <p>Seven Star Green (Co55)</p> <p>It is important that the alternatives considered, impacts assessments and associated mitigation proposals are all detailed in the ES.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Para 8.6.22</b></p>	<p>RE: Ancient Woodland</p> <p>The route appears for the most part to be located across arable land, but we note that the draft Order Limits go through and run adjacent to several sites of Ancient Woodland (Irreplaceable Habitat).</p> <p>The draft Order Limits go through Ancient Woodlands at Fiddler’s Wood and Stonefield Strip. The citation for Black Brook LWS, also intersected by the draft Order Limits, describes the presence of Ancient Woodland. The draft Order Limits also overlap The Coombs and Harrow Wood, which are both considered possible sites of Ancient Woodland as several ancient woodland indicator species have been identified as present there.</p> <p>The draft Order Limits run adjacent to other Ancient Woodland sites, namely Aldham Hall Wood, Church House Wood, Fiddlers Wood, Hill House Wood and Wood near Fordham Place.</p> <p>We expect that appropriate measures will be taken to protect these ancient woodlands (irreplaceable habitats).</p> <p>Smaller ancient woodland parcels (&lt; 2ha) are not included in the Natural England inventory. We expect that the completed habitat survey work will identify any such parcels in the study area.</p>
<p><b>Volume 3, Technica</b></p>	<p>RE: Hedgerows</p> <p>We note that all hedgerows within the draft Order Limits will be</p>

<p><b>I Appendices - Part 1 of 4; Appendix 8.1; Paras 3.2.6; Table A8.1.4</b></p>	<p>surveyed as part of the habitat surveys.</p> <p>Hedgerows &gt;30 years old will be assessed by an ecologist as to whether they meet any of the eight criteria outlined in Part II, Schedule 1 of the Hedgerows Regulations (HMSO, 1997).</p> <p>Within Section C, twenty hedgerows (not all within the Colchester Borough) have been targeted to go through Hedgerow Regs Assessment and within Section D four have been targeted.</p> <p>We note further hedgerow assessments will be carried out as the Phase 1 Habitat Surveys are ongoing.</p>
<p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; para 8.5.33  &amp;  Volume 3 – Technical I Appendices – 2 of 4; Appendices 8.6-9</b></p>	<p>RE: European Protected Species (Great Crested Newt, Hazel Dormouse, Otter &amp; bats)</p> <p><i>Great Crested Newt</i></p> <p>We welcome confirmation that National Grid has agreed with Natural England to apply to the District Level Licensing scheme for Great Crested Newt (GCN) instead of surveys. We highlight that a countersigned IACPC will be needed to support the DCO. We acknowledge that GCN are therefore now scoped out from further assessment in the ES. However, it is expected that best practice methodology will be used during the construction phase to mitigate for potential impacts on other mobile species such as Priority amphibians, reptiles and Hedgehog.</p> <p><i>Hazel Dormouse</i></p> <p>Four areas within Colchester Borough are targeted for survey for Hazel Dormouse as shown in Figure A8.8.1. We recommend that the Essex &amp; Suffolk Dormouse Group should be involved in consultations on survey methodology.</p> <p><i>Otter</i></p> <p>We support the methodology outlined for Otter. Figure A8.9.1 shows multiple survey points within Colchester Borough.</p> <p><i>Bats</i></p> <p>Only the Bat Roosting desk study result is available at present and so we await the results of the data collected during the 2023 surveys and the results of the Ground Level Tree Assessments undertaken between November 2023 and March 2024 (Section 4).</p>



	<p>We note that Bat Activity surveys have been undertaken (Appendix 8.6 and 8.7). Three high risk level areas and six medium risk level areas are shown within the Colchester Borough by Figure A.8.7.1. Red areas 12 and 14, and Amber areas 11 and 13, are all missing from the list of survey sites in Annex C and presumably are targeted for survey in 2024. These high and medium risk sites are expected to undergo static detector surveys which will inform the need for any further investigation. Please be transparent as to how the static detector survey results were appraised, and the criteria used for judging if an elevated survey effort was warranted or not.</p> <p>We note there are 3 roost records and 21 activity records for the rare Barbastelle bat in Essex (Table A8.6.4). This Appendix II species (Bern and Bonn Conventions) will need adequate assessment to avoid severance to foraging and commuting routes within any sustenance zones of a maternity colony.</p> <p>Based on experience from other linear projects, we suggest that where hedge crossings or removals are necessary to retain connectivity during construction, an alternative to dead hedging is the use of Heras fencing with camouflage netting attached. We can provide more information on request. This temporary measure will be needed to enable certain bat species to continue to use affected hedgerows as part of their established commuting and foraging networks.</p>
<p><b>Volume 3 – Technical Appendices – 2 of 4;</b></p> <p><b>Appendix 8.9</b></p> <p><i>Reptiles</i></p> <p><b>Appendix 8.3;</b></p> <p><b>Para 3.2.13, Table</b></p>	<p>RE: Protected species</p> <p><i>Reptiles</i></p> <p>One ‘Key Reptile Site’ has been identified from across the draft Order Limits within Colchester Borough – the Colne Valley. That site will be subject to a series of reptile surveys according to an acceptable methodology.</p> <p>Ten other locations have been identified as having suitability for reptiles: Redhouse Farm; Otters Brook Cottage; Old House Road; Newhouse Farm; Westwood Home Farm; Grove Lodge; Highfield Farm; Coney Byes Farm; Marks Tey; Little Tey House Farm.</p> <p>These ten sites have been ruled out from further presence / likely absence surveys, either because impacts are considered avoidable or because displacement by habitat manipulation is the most appropriate mitigation solution regardless of survey result.</p>

<p><b>A8.3.8</b></p> <p><b><i>Breeding birds</i></b></p> <p><b>Appendix 8.4, Para 1.2.4, 4.2.6, Figure A8.4.2</b></p> <p><b><i>Otter and Water Vole</i></b></p> <p><b>Appendix 8.9, Paras 3.3.2 and 3.3.6; Table A8.9.2</b></p> <p><b><i>Badgers</i></b></p> <p><b>Volume 1, Chapter 8 Ecology &amp; Biodiversity; Para 8.6.61</b></p>	<p>Whilst we acknowledge the logic of this approach in principle, the applicant will need to provide a supported argument as to why is the best approach for reptile species. This should include demonstrating how effective mitigation will be achievable in all instances.</p> <p><i>Breeding birds</i></p> <p>Natural England are stated as agreeing to the acceptability of the approach taken for breeding bird surveys, but also that they have not commented on the selection of survey locations.</p> <p>Seven ‘Areas of Potential Importance for Breeding Birds’ have been targeted based on desk study and the perceived risk of impact. These are the only sites to be subject to breeding bird surveys. The survey areas will cover 200 m buffers around “key areas of effects such as cable easement, CSE compounds and substations”.</p> <p>Within Colchester Borough, the underground cabling section from the River Stour to Ardleigh Rd, Lamb Corner is being covered by breeding bird survey.</p> <p>The position that the project’s total draft Order Limits of 184 km long and 100-220m wide (plus a 200m buffer) cannot be completely surveyed for breeding birds is recognised, and that identifying priority sites for survey is the practical solution. However, it will be necessary for the applicant to demonstrate that they have not overlooked any additional sites worthy of survey within Colchester Borough. Furthermore, we would still expect that there will be a well-reasoned estimate made of the potential overall cumulative impact on breeding birds from the project.</p> <p><i>Water Vole</i></p> <p>We support the methodology outlined for Water Vole. We would like to see clarification of the method used (i.e., habitat parameters) for determining the Water Vole habitat suitability of a watercourse, and more detail as to how the issue of dense vegetation was resolved so that it did not present a significant survey constraint.</p> <p><i>Badger</i></p> <p>It is understood that surveys are identifying all badger setts within 30m of the draft Order Limits, and that these surveys are ongoing. The mitigation hierarchy should be implemented to reduce the</p>
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	impacts to Badgers and their setts.
<b>Other matters</b>	<p>The River Stour and River Colne are particularly important biodiversity areas, with Ramsar/SPA/SAC designations, that are crossed by the draft Order Limits. These sites cover large areas and form connected corridors composing a mix of priority habitats. Robust mitigation plans will be required to ensure that the condition and connectivity of these habitats is not diminished.</p> <p>We (Place Services) will be interested to be involved in any discussions on habitat restoration planting schemes and BNG-related enhancement schemes.</p>

67. Trees/Arboriculture

68. It is foreseeable that the proposal will have various impacts on trees and vegetation throughout the course of the development and construction phases. There are several woodland areas and individual trees that are covered by statutory protection and so relevant checks with the Local Planning Authority will be required prior to undertaking works.

69. The Landscape and Visual Assessment has identified several veteran trees along the route throughout Essex as well as areas of Ancient Woodland or semi-natural woodland within 15m of the Planning Application Boundary which would be considered irreplaceable habitat. Consideration should be given during the design and construction phases to avoid disturbance of these areas and landscape features. It is worth noting that there could potentially be other Veteran trees along the proposed route that have not yet been identified within any national catalogue such as the Ancient Tree Forum. As such, it is recommended for a Veteran Tree Assessment to coincide with any other Arboricultural Surveys to identify any Veteran trees that are within 15m of the Planning Application Area.

70. A Preliminary Environmental Information Report (Volume I) has been developed that shows the standard mitigation, which is to be applied throughout the duration of the scheme to ensure the retention of trees along the proposed route. A general approach to vegetation clearance has been outlined where the Project interacts with woodlands, trees and hedgerows, this involves significant areas of vegetation clearance to facilitate overhead and underground cabling as well as Haul route construction. It is stated that additional detail will be included within the ES, including details of veteran trees to be avoided / removed that have been identified through surveys, and temporary construction works impacts.

71. Proposed underground cables at Dedham Vale National Landscape (formerly AONB), Great Horkesley would result in significant vegetation loss. To facilitate the construction of the underground cable a typical 120 m wide swathe of vegetation is expected to be removed. The construction methods and working widths required for installation of the underground cables will continue to be developed to seek to reduce loss of existing characteristic vegetation within Dedham Vale National Landscape (formerly AONB) and its setting. Where practicable, commitments will be made to reduce the working area through sensitive locations and the design developed to seek to avoid vegetation loss.
72. Arboricultural Impact Assessments (AIA) will be required to be submitted to assess the quality of the existing trees on and adjacent the proposed site. This assessment should be undertaken in accordance with 'British Standard 5837:2012 Trees in relation to design demolition and construction – Recommendations' and should provide details on trees and shrubs to be retained and/or removed, the impact on them and any constraints. This survey will identify whether trees currently on site are in adequate condition to pose a constraint on development and will outline the required protection for retained trees. The survey should be done in advance of a design being fixed to prevent any conflict with high value trees, woodlands and hedgerows. Once the design is fixed, an Arboricultural Method Statement (AMS) and accompanying Tree Protection Plan (TPP) will be required to ensure retained trees are suitably protected throughout the course of the development.
73. There should be opportunities to replace trees that do pose a constraint or cannot be retained throughout the construction process with species that will contribute to the local character and provide benefits to the ecosystem and locality. Where existing trees pose a constraint or their removal is required to facilitate this development, replacement planting opportunities should be incorporated into the design through methods such as native hedgerows and should be presented with the submission of a Soft Landscaping Plan.
74. Standard mitigation measures have been outlined within the enclosed documents. Where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), a suitable protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary. The protective areas will be shown on the 'Retention and Reinstatement Plans' contained within the LEMP.
75. It is the intention that where practicable, elements within the landscape will be retained such as vegetation and hedgerows. However, where there is conflict with the design/scheme and vegetation cannot be retained, replacement planting will be used as appropriate (including re-instating hedgerows, fences,

and walls).

76. We are satisfied that all the Main Works Contractors will apply the relevant protective principles set out in British Standard (BS) 5837:2012: Trees in relation to design, demolition, and construction. This will be applied to trees within the Order Limits which will be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction. All works to high grade trees, including trees under Tree Preservation Orders and Veteran trees, will be undertaken by a suitably qualified and experienced arborist, and supervised by an AcoW.
77. Further technical documents such as an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection plan are usually made available at the later stages of the proposal. However, methods to reduce any impacts to retained trees particularly in relation to Veteran trees and Ancient Woodland should be outlined to demonstrate that there will be no adverse impacts before designs are finalised.
78. The CCC Arboriculture Planner has requested a full Tree Survey, Arboriculture Impact Assessment (AIA) and Arboriculture Method Statement where trees are directly impacted by either the trenching, the tower positions or by infrastructure (haul roads, access points and so on). A clear Tree Protection Plan (TPP) should be supplied for the whole of the order limits clearly showing what trees are to be removed, what trees need to be cut back or coppiced and what trees can be retained. Without this it is impossible to note the level of removal and the quality of the landscape features that are proposed to be removed - this clearly has a knock on effect for assessment of harm in landscape and ecological terms.
79. Notwithstanding the lack of detail in this regard, the Council have the following particular concerns, a list that will likely increase once it is clear what trees will be removed, what will be pruned and what can remain:
80. Section C: Langham
81. At the northern section of the CCC boundary OS ref TM 03557 34540 as the undergrounding splits around the lake, the St Edmund Way and Stour Valley Path pass alongside three important trees that appear to be removed. These need to be assessed for quality but they are highly important landscape features in this very sensitive landscape. The route should be reconfigured to retain these trees.

82. The trees that line the drive to Langham Hall appear to site outside of the order limits but they should be protected and retained during the construction phase.
83. South of the road crossing TM 03394 33344 the construction swathe appears to remove a significant amount of planting, including the TPO'ed line of trees along the driveway. This needs to be assessed and fully justified.
84. South of Glebe House there is further tress loss, this should also be assessed and justified.
85. One of the most damaging sections of the alignment is located at Black Brook TM 03098 32454 where a large swathe comprising hundreds of trees look to be removed. It is difficult to be precise due to the rather rudimentary drawings provided at this stage, but it appears to be in the region of 800+ trees removed on this section. This is devastating in ecological and landscape terms. CCC strongly suggest alternative underground methods of crossing this area are considered to avoid such significant habitat loss.
86. It is also requested that the veteran tree noted to the west of the alignment at TM 02924 32478 appears to be just outside of the DCO order limits, please ensure this is retained.
87. There is a large Oak in the hedge line west of the new access point and new left turn bell-mouth on Perry Lane, Langham TM 03028 31876. CCC request that this oak is retained even if it projects slightly into the vehicular visibility spay such is its importance in the scene and wider landscape.
88. Section C: Dedham
89. A whole block of trees appears to be removed at TM 03634 31823 and another larger block that runs alongside the A12 at TM 03495 31672 is potentially at risk. Both need to be assessed for their arboriculturally quality and the larger block must be retained if one of them has to be felled to facilitate the undergrounding.
90. Section D: Langham
91. The road crossing at East View on Langham Lane TM 00663 30226 appears to require the removal of a number of fine roadside Oaks, alongside a beautiful domestic garden that extends into a landscaped piece of domesticated woodland. These trees need to be surveyed and methodology

provided to ensure the least amount of them are removed or pruned heavily for line clearance.

92. Section D: Boxted

93. The PRow that extends from Pepper Lane (off of Boxted Straight Road) in Boxted exists the lane and then turns a right angle north. It then runs along a line of mature oaks which sit between proposed pylons TB31 and TB32 just before the CSEC – in the position of the '99' on the OS base on Figure 4.1 pages 35 of 60, OS grid ref 98994 30484. It is assumed these oaks will be removed or at least very heavily cut back. The route should be amended to avoid this important row of trees.

94. Section D: Great Horkesley and Little Horkesley

95. It is assumed that the tree/ hedge lined section of School Road TL 96967 30687 that sits just outside of the order limits will be retained.

96. Section D: West Bergholt

97. The isolated open grown field trees at TL 94729 29287 must be assessed and if possible, retained. The block of trees on the corner on the field boundary to the south of that at TL 94687 29197 appear to be retainable, they too should be assessed and retained where possible – they appear to be far enough away from the alignment to be retained with a significant crown reduction.

98. Section D: Fordham

99. West of Fossetts Lane at TL 93644 28280 the alignment passes over a group of 4/5 oaks in a fairly open position. These need to be assessed and look to be retainable. Further along Fossetts Lane the alignment clips TL 93322 27971 which has a prominent tree on the roadside – this needs to be assessed.

100. At the southern end of the open access land the alignment crosses the woodland at TL 92778 27278. CCC hopes that the alignment can be tweaked to remove the need to fell this section of woodland at all, but in any event it needs to be assessed and catalogued to ensure it is adequately compensated for noting this is all publicly accessible land.

101. Slightly further south there again appears to be significant tree loss required at TL 92647 27191 adjacent to the river. This needs to be assessed and the

most important trees retained if at all possible. The alignment then clips the corner of the tree block at TL 92497 26890 which also needs assessment.

102. Section D: Aldham

103. The crossing of Fordstreet Hill is most unfortunate as it is located at the most harmful location possible on this steep hill which forms the approach to the Ford Street Conservation Area. The alignment chosen removes more than just the old treed hedge line but also removes excellent trees in a larger block at TL 92238 26614. As the construction access points are proposed on this hill (either side of the carriageway) there appear little chance this area can be saved from being very harmfully degraded but sensible micro siting choices may enable some trees to remain. This is especially important as the construction swathe for the alignment will have significant public visibility along the access points so any filtering that can be retained must be.

104. On Green Lane at TL 92027 26139 there is another block of trees that must be assessed before being removed.

105. Section D: Marks Tey and Great Tey

106. In Great Tey there are a number of veteran trees noted close to pylon TB060 at TL 90829 24757 and TB065 at TL 89264 24194 should be retained if at all possible. Officers noted on site (with the Council's tree officer) that there appear to be three more veteran trees close to the alignment southwest of TB 90829 24757 which appear to fall within the order limits but are likely to be able to be retained. Please assess these trees (which are all open grown) and make efforts to retain them.

107. On Salmons Lane the alignment crossed an important triangle of tree lined roads at TL 88282 23777 – the trees in question needs to be assessed and only pruned for clearance where needed.

108. Further west there is a similar situation at TL 87881 23568 where it appears tree conflict is present for no good reason. Pylon TB 069 is unfortunately located close to the apex of two tree belts - and right in the line of site of the Kings Head Public House, an important Inn on the A120 which has a tranquil garden and rooms for rent to the rear. TB 069 should be moved slightly – say 20m - north to filter views from this well used tourist location and the apex of



two well walked PRoW's – this would also remove the conflict with the lovely deep hedge/tree line that does not need to be felled.

109. BNG

110. The Council note that the scheme currently results in a 6% decrease in biodiversity from the baseline although it is unclear how this has been assessed when the PEIR notes that there is a great deal of ecological assessment to do still to inform the ES – for example it is difficult to accurately configure a BNG baseline without having assessed the quality and amount of the trees to be removed and there appears to be a potential for many to be lost unfortunately.

111. It is further noted that there is an intention to provide a 10% uplift from the baseline. The Council consider the NGET should be going significantly further than the national baseline of 10% BNG and should commit to provide 20% uplift for the whole project. Apart from the transition to net zero, the BNG is one of the only tangible benefits this scheme will bring to the environment, but it has to be done well.

112. The Council require significantly more detail as to how this uplift is to be provided either within the order limits or outside of the order limits. In the inevitable position that offsite units are to be used, **the Council would want to see the off-site gains made in locations within the CCC administrative boundary** as close to the order limits as possible to ensure that where biodiversity is lost it is compensated for directly.

113. **Contaminated Land, Geology and Hydrogeology**

114. The Council's in house contaminated land officer has assessed the PEIR and they have the following comments:

115. The National Grid Preliminary Environmental Information report Volume I main Text. Dated April 2024. Reference AENC-NG-ENV-REP-0002

116. Norwich to Tilbury great grid upgrade Map

117. The above-named documents have been reviewed and are acceptable for the purposes of the Environmental Protection Team. Please note that only relevant information relating to any potential contaminated land within the Borough of Colchester city council has been assessed as part of this response.

118. The findings of the report seem reasonable and at this time we would have no objections.

119. Preliminary Environmental Information report Volume III technical appendices part 2 of 4. Dated April 2024. Reference AENC-NG-ENV-REP-0004

120. The above named report is acceptable for the purposes of the Environmental Protection team. Please note, no geotechnical information has been assessed as part of this. Only information relating to Colchester City Council has been considered as part of the application.
121. The Environmental Protection team would have no objections to the project based upon the information provided to date. However, we would request that any unexpected contamination must be reported in writing to the local authority.

## 122. **Health and Wellbeing**

123. CCC concur with ECC's Public Health, Wellbeing and Communities comments, the area relevant sections of which are set out here for completeness:
124. The NPS EN-1 highlights the potential impact of energy infrastructure on the health and wellbeing of the population, while also emphasising the societal benefits of access to energy. We acknowledge that the Norwich to Tilbury Project is a significant step towards the transition to net zero, aligning with the Everyone's Essex commitment to advancing sustainable energy across the County. This transition will ultimately benefit the health and wellbeing of the entire population. However, we recognise that the construction and operation of such infrastructure can have direct and indirect impacts on health.
125. ECC's Public Health, Wellbeing, and Communities Team has reviewed the Preliminary Environmental Information Report (PEIR) and associated documents, focusing on the wider determinants of health and wellbeing in which *Population and Human Health* will be considered within Environmental Statement.
126. Based on this review, we offer the following comments and recommendations to maximise the positive impacts of the Project and to mitigate potential negative effects:
127. Health Impact Assessment:
128. The Project crosses through Tendring, Colchester, Braintree, Chelmsford, Brentwood, and Basildon where local planning authorities require a Health Impact Assessment (HIA) according to local guidelines. However, we note the PEIR follows IEMA guidance to ensure the health and wellbeing chapter aligns with HIA principles that consider the wider determinants of health and health inequalities.
129. The use of WHIASU vulnerable groups checklist combined with protected characteristics under the Equality Act 2010 to define vulnerable populations and the link to EIA technical topics within the health and wellbeing chapter is welcomed. However, we recommend the following enhancements:

130. The PEIR recognises that impacts on health will vary between different population groups. However, there is no clear distinction of impacts among varied groups within the health and wellbeing preliminary residual effect Table 10.3 (during construction) and Table 10.4 (during operation). This assessment is important for addressing inequalities within our communities. We strongly recommend that this is explored and presented within the ES and to consider the following:
131. Identify potential inequalities in the distribution and nature impacts
132. Are particular groups or vulnerable groups more likely to be impacted than others and is this clearly described and explained?
133. What indicators within the current health baseline that are worse than England average/ local ward or LSOA levels?
134. Landscape and visual impacts:
135. The PEIR notes significant negative effects on landscape views and visual amenity during both construction and operation, with potential impacts on health of residents. Report notes it is difficult to conclude an overall significance on health and wellbeing of landscape and visual effects during the operation (and maintenance) and considered to be neutral during construction due to temporary effects and relevant mitigation. It is crucial to assess these impacts further within the ES. We recommend:
136. As stated in Paragraph 13.9.29, assess how to further reduce visual effects in some locations through additional measures to help change the effect from significant to not significant within localised areas or from specific visual receptors. To also incorporate qualitative input from impacted receptors.
137. The Essex Healthy Places Guidance and Essex Green Infrastructure Strategy highlight evidence base around the positive benefits to health and wellbeing from open green and blue spaces. We recommend that the Ecology and Biodiversity section of the ES is also considered within the Health and Wellbeing chapter. There may be potential health benefits from mitigation strategies that aim to improve the natural environment along the linear route of the Project. LV10 highlights mitigations that the draft Order Limits could include adequate room for planting and potentially mounding for additional screening.
138. Paragraph 13.8.12: notes significant negative visual effects during construction which could potentially include lights if present at night that could extend up to 2km of the draft order limits in some locations. It is noted that effects would be transient and change throughout the construction period noted in paragraphs 13.8.16 to 13.8.19. However, further assessment of landscape and visual effect should be presented within the ES.

139. PEIR notes that significant negative effects on views and visual amenity during operation (and maintenance) are predicted to be experienced for the majority of receptors particularly where close views of the Project are available and are unable to conclude on overall significance on health and wellbeing during operation of the Project. Public Health encourages consideration of how significant negative impacts could be off set through positive community benefits for local communities within Essex, such as funding for community energy schemes, training, and skills investment within the local area for those adversely affected by the Project particularly in areas of with high levels of deprivation.
140. Socioeconomics, recreation, and tourism:
141. It is positive to note that National Grid wants to leave a lasting positive impact amongst the communities and to help those areas to thrive and support a sustainable future. To enhance efforts, we recommend:
142. Three of the local authorities in Essex (Tendring, Basildon, and Colchester) are part of our Levelling Up areas within Essex where efforts are being developed to create opportunities for communities within those areas to succeed in life. The report recognises that parts of our communities experience high levels of income deprivation, child and fuel poverty and some populations in the district experience negative health outcomes compared to more affluent areas, particularly, in Tendring, Basildon and Colchester. We recommend consideration of how direct employment for the Project would target and secure employment for residents along the linear Project supporting to reduce inequalities in the area.
143. Further information is needed to understand how different stages of the Project will maximise benefits of the scheme, particularly, during construction. Opportunities for encouraging local employment could be supported through the development of an employment strategy that is inclusive and supports reducing inequalities.
144. Prioritising pedestrians and cyclist through changes in physical infrastructure can have positive behavioural and health outcomes, such as physical activity, mobility, and cardiovascular outcomes. The ES should consider how PRoW will be maintained where there are rerouting of pathways.
145. Statement of Community Consultation/ Engaging with communities:
146. We note that NG recognises that people may have concerns about the potential impacts of living close to an overhead line, and that the uncertainty whilst the proposals are developed may cause anxiety. We note that efforts have been sought to reduce potential effects on communities, residents through engaging with stakeholders and engaging communities about the proposals. We recommend the following:

147. EN-5 highlights that research has not proven a causal link between EMFs and cancer or any other disease. However, it is noted that local communities may be concerned about the potential health effects associated with EMFs. We are unsure of how community anxiety has been identified and how responses have been provided to the community. Community engagement is important for addressing concerns and anxieties on EMFs.
148. Further information is required to understand which other organisations were consulted such as the Mid and South Essex Integrated Care System to ensure the right expertise is engaged in the process. Also, to understand how the consultation has supported to steer, shape and maximise the benefits of the Project.
149. Policy context:
150. The report notes that regional and local policy specific to health and wellbeing will be reviewed and assessments undertaken in relation to compliance with this policy in the ES. For a more comprehensive assessment, we recommend the following:
151. The health policy context of the PIER needs to broaden out to consider not only the Essex Joint Health and Wellbeing Strategy, but also the localised Health and Wellbeing Strategies/Plans (in Chelmsford, Brentwood, Basildon, and Colchester Three Year Plan - A City fit for the future). To also consider both Integrated Care Board's Joint Forward Plans for Mid and South Essex Integrated Care System and Suffolk and North East Essex Integrated Care Board.
152. Whilst assessing regional and local policies, the report would benefit further from scoping in opportunities to achieve benefits from the scheme for reducing health inequalities and consider how Project can contribute to improving local health outcomes identified in the above strategies.
153. Conclusion:
154. The aforementioned areas should be considered for improvement to enhance the Project's positive impacts as reported within the PEIR.
155. **Historic Environment**
156. CCC have the following comments on the Historic Environment section of the PEIR:

157. Historic Environment comments - PEIR: Non-technical summary

<p><b>Para 5.7.3</b></p>	<p><b>It would be useful to have an understanding of the full number of designated assets pre PEIR ER to assess the level of those that have been scoped into this assessment and those which have been excluded.</b></p>
<p><b>Para 5.7.5</b></p>	<p>The standard mitigation proposed related to the historic environment are inadequate, and it would be expected that a detailed program of archaeological investigation has occurred in advance of the submission of the application so that the impact on heritage assets is understood. This reduces the potential of long delays to the development due to unexpected archaeological deposits being identified. The completion of this work in advance allows an informed mitigation strategy and outline written scheme of investigation which can be integrated with the Outline Code of Construction Practice.</p> <p>Although the preliminary assessment has identified many impacts along the proposed routes further evaluation in the form of geophysics, aerial photographic rectification and trial trenching is likely to identify many more heritage assets.</p>

158. Preliminary Environmental Information Report: Volume I – Main Text Historic Environment Chapter 11

159. Historic Environment comments - PEIR: Volume I – Main Text Historic Environment Chapter 11

<p><b>Table 4.2</b></p>	<p><b>Underground cable: Although this reduces impact to the setting of designated heritage assets it significantly increases the impact to the below ground archaeological deposits.</b></p>
<p><b>Table 4.2</b></p>	<p>The creation of a haul road along the length of the development corridor will impact below ground archaeological deposits and will increase the area requiring archaeological assessment to understand the impact this will have on the archaeological resource.</p>
<p><b>Para</b></p>	<p>The temporary compounds will require archaeological</p>

<b>4.8</b>	assessment to identify heritage impacts so that these can be identified within the mitigation strategy to be included with the COCP. Once identified the overhead line stone working areas will require assessment.
<b>Para 4.8.39-40</b>	It is assumed that hedgerow regulations would result in each of the hedgerows being assessed to see if they meet the heritage protection criteria and that in regard to those hedges the width of the clearance would be reduced or directional drilling would be considered.
<b>Para 11.1.3</b>	The Historic Environment Baseline Report and, consequently the PIER, are based on preliminary project design information and survey data gathered to the end of September 2023. It is our understanding, from 'alignment briefings' and archaeological workshops provided by National Grid, that the project design has evolved since this time, and so the 'Historic Environment Study Area' will need to be refined. As such, it is possible that not all heritage assets which have the potential to be impacted have been identified to date and the Historic Environment Baseline Report is likely to change.
<b>Para 11.2.6</b>	This paragraph should also refer to the NPPF section 16 on the Historic Environment.
<b>Para 11.3.1</b>	The scope of the assessment is in line with comments provided at non-statutory consultation.
<b>Para 11.4.2 Table 11.1</b>	<p>There have been concerns raised especially regarding the undergrounding sections and haul road that appropriate archaeological assessment in the form of trial trenching would be completed and reported on to inform the inspector.</p> <p>There is also concern regarding the considerable delay in receiving the Written Scheme of Investigation (November 2023) for the geophysics which resulted in a considerable amount of survey work being completed prior to receiving a final version. Still have not received a WSI for the trial trenching.</p> <p>A WSI for the trial trenching evaluation has not yet been provided for comment or approval.</p> <p>Final section: it is unclear how an agreed list of viewpoints will be</p>

	provided within the ES if detailed discussion and appropriate reasons have not been given for omitting or including the several thousand designated heritage assets along the route to the local authority advisors.
<b>Para 11.5.3</b>	Although the principles of the study area are agreed, it is noted from recent meetings that the study area, the Historic Environment Baseline Report, and the PIER is not based on the current preferred alignment which has changed.
<b>Para 11.5.7</b>	Discussions have taken place in the archaeological interest group that aerial photographic assessment and rectification should be undertaken. We have been informed that generally accessible aerial photography has been studied but that held by local authorities is yet to be studied.
<b>Para 11.5.2 3</b>	A thorough and detailed setting assessment based on up-to-date and relevant project design information is critical to understanding the contribution the setting of a heritage asset makes to its significance, how and to what degree the development project will impact on that setting and significance, and to informing any mitigation strategy.
<b>Para 11.5.2 4</b>	At the time of the production of the PIER the setting assessment is identified as a key element of the baseline, however, 11.5.23 states this will not be completed till 2024.
<b>Para 11.5.2 6</b>	<p>The AP data held by local authorities will be an important source which at present has not been utilised. It is important that these are appropriately rectified to inform the ES accurately.</p> <p>The inclusion of protected lane data is welcome; these also have the potential to be impacted by noise, vibration and lorry traffic.</p> <p>Reference to paleoenvironmental and geo archaeological deposits as a further data set is missing from here and is available in Essex. There will need to be a geoarchaeological DBA included within the ES for those important deposits across Essex.</p>
<b>Para 11.5.3 1</b>	It is acknowledged that any assessments are an iterative process which is subject to change and updates as the project design evolves. In this instance that process may require undertaking Steps 1, 2 and 3 of the Historic England Guidance GPA3: The



	Setting of Heritage Assets, when design changes are considered; design changes may affect the accuracy of the Historic Environment Baseline Report.
<b>Para 11.5.3 2</b>	Although the comment regarding the effectiveness of a walkover survey on modern arable fields is supported fieldwalking has in the past been used as an effective evaluation method when defining the presence of sites. A walkover of undated cropmark sites has the potential to provide supporting data.
<b>Para 11.5.3 6</b>	The commitment to consider any effects on the Historic Environment associated with mitigation proposals for other environmental receptors is welcome. There is concern that there is enough time to complete the surveys especially the trial trenching.
<b>Para 11.6.1</b>	The baseline conditions used within this assessment may not be accurate and are likely to change with the revised route proposals circulated in December.
<b>Para 11.6.1 5</b>	If other NSIPS progress such as the Lower Thames Corridor, A12, Flexible energy plant in Tilbury will these not have an impact on the order limits?
<b>Para 11.6.1 7</b>	Due to the evolution of the project design since September 2023, there may be changes to the known and anticipated changes to the baseline.
<b>Para 11.7.5</b>	It is recommended that the Draft Outline CoCP should include a section similar to that in 11.7.7 as a main HO number from the start. The destructive results of undergrounding will have a significant impact on a number of heritage assets. Similarly, although not on such a wide area, the construction of the haul road through a rural area where the archaeological deposits are only at a shallow level (c. 0.30m on average) will have similar impacts.
<b>Para 11.7.5 (HO3)</b>	It is assumed that all of the hedgerows will be checked to see if they meet the hedgerow regulations as a protected hedgerow and that the results will be provided within the Historic Environment section of the ES.

<p><b>Para 11.8.1 1</b></p>	<p>There needs to be detailed reasons why mitigation is not proposed on non-designated assets that are being impacted by not significant permanent negative effects.</p>
<p><b>Para 11.9.6</b></p>	<p>The reduction of the Stour crossing to a single crossing would be a benefit. Appropriate archaeological and geoarchaeological assessment within the area would allow the best option to be chosen. Either option at present will have a significant archaeological impact on known heritage assets.</p>

160. Historic Environment Baseline Report

161. Historic Environment comments - Historic Environment Baseline Report

<p><b>Para 1.5.4 Additional data</b></p>	<p><b>There is concern that this data has not been considered in identifying the route, locations of the pylons and the undergrounding sections. Aerial photographic rectified data and cartographic data will be essential for use on understanding the impact on below ground deposits especially in those areas where undergrounding or ground disturbance is proposed. The data will also be important in influencing the location of pylons so that known or identified heritage assets can be protected. The large collections of aerial photographs held by the local authorities will need to be assessed and all cropmarks appropriately rectified. Reference to paleoenvironmental and geoarchaeological deposits as a further data set is missing from here and in section 11.5.26 in the main PIER text. Essex has spatial data for Palaeolithic potential available as a GIS layer which will be important for assessing the potential impact on buried deposits within the undergrounding sections in Essex and especially Thurrock and Tendring. A geoarchaeological DBA will need to be included with the submitted documentation.</b></p>
<p><b>Section 2: Archaeological and Historical</b></p>	<p>The introduction at the start of this section would benefit from identifying what the numbers in the brackets relate to, either in the form of National Heritage List for England, Historic Environment Record no. or Project list no. and which tables they relate to.</p> <p>Within each development section it would be useful to have an understanding of how many designated sites have been scoped</p>

<p><b>ical Backg round</b></p>	<p>out at the pre-PIER and PIER stages prior to summarising the areas.</p> <p>Within Section H the cut and paste method has resulted in a number of references to Section B being left in. It is unclear whether the total figures within the Thurrock section for non designated heritage assets include the extensive heritage assets identified from the recently completed Lower Thames Crossing survey which have not been added to the HER but it is understood the information has been shared. Similarly recent large scale excavations identifying Roman salt production close to the southern end of the route are not identified.</p> <p>The Tendring and Thurrock Section fails to include information on the potential for Paleoenvironmental and geoarchaeological deposits which are located within the order limits.</p>
<p><b>Section 3: Baseli ne</b></p>	<p>It would be useful in the introduction to have a clear description of how the different landscape level assessments have been undertaken within Essex. The various assessments used are not all related in a structured way and originate as separate projects. Within the landscape sections there is a mix of National Character Areas, Historic Environment Characterisation (with the omission of the Historic Environment Character Areas but concentrating on the Character Zones), and the Historic Landscape characterisation project (should be Bennett 2011). We are supportive of these being used but there needs to be a statement on how they may complement each other.</p>

- 162. This section sets out Place Services' Built Heritage Team's response, in relation to the PEIR and various appendices, from an Essex-wide / general perspective.
- 163. Preliminary Environmental Information Report: Volume I – Main Text
- 164. Built Heritage Comments re: PEIR: Volume I – Main Text

<p><b>Para 4.7.11</b></p>	<p><b>The temporary closure of PRowS may impact the ability to appreciate the significance of heritage assets. This should also be assessed.</b></p>
<p><b>5.6.8</b></p>	<p>With regards to built heritage, there is clear national guidance on assigning significance. A building is listed when it is of special</p>

	<p>architectural or historic interest, considered to be of <b>national importance</b> and therefore worth protecting (Historic England, <i>Living in a Grade I, Grade II* or Grade II listed Building</i>. 2012). As such, and in the context of Table 5.1 (page 110), all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of ‘high value’ could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example.</p> <p>Consequently, some non-designated heritage assets should be considered of medium value as may be of regional importance.</p> <p>The baseline report should be amended to reflect this categorisation of all designated heritage assets as ‘high value’ with consequential changes to the significance of effects which need to be amended accordingly.</p>
<b>11.1.1</b>	<p>No reference is made to conservation areas in this paragraph (however it is noted that conservation areas are referred to in 11.6.6 and have been assessed in Appendix 11.2). For clarity, conservation areas should also be referenced in this paragraph.</p>
<b>11.1.3</b>	<p>The Historic Environment Baseline Report and, consequently the PEIR, are based on preliminary project design information and survey data gathered to the end of September 2023. It is understood from ‘alignment briefings’ provided by National Grid throughout March 2024, that the project design has evolved since this time, and so the ‘Historic Environment Study Area’ will need to be refined. As such, it is possible that not all heritage assets which have the potential to be impacted through change within their setting have been identified to date.</p> <p>It is therefore noted that the Historic Environment Baseline Report will require review and is likely to change.</p>
<b>11.3.1</b>	<p>The scope of the assessment is in line with comments provided at non-statutory consultation.</p>
<b>11.4.2</b> <b>Table</b> <b>11.1</b>	<p>We are awaiting further engagement with National Grid to agree the methodology/selection process for viewpoint assessments. At this stage, the methodology for the assessment of heritage-specific viewpoints presented in March 2023 is felt to be insufficient in scope, with limited information given on the reasons for inclusion/ omission of numerous assets.</p>

	<p>It remains unclear whether the viewpoints proposed for assessment within the ES will be agreed with the LPAs prior to assessment or based solely on National Grid's assessment criteria. There should be scope for the creation of an agreed list of viewpoints, prior to the ES being written, and following detailed discussion.</p> <p>NB: the table states 'An agreed list of heritage viewpoints will be presented in the ES.', but no details are given of how this will be agreed.</p> <p>The comments on LPA engagement re. viewpoints make no reference to non-designated heritage assets; however, these are described as being under discussion with Historic England. This two-pronged approach, differing between HE and the LPAs is not acceptable.</p>
<p><b>11.5.3</b></p>	<p>Although the principles of the study area are agreed, it is noted that the existing study area, the Historic Environment Baseline Report, and the PEIR, are not based on the current preferred alignment and thus subject to change.</p>
<p><b>11.5.1 6</b></p>	<p>It is agreed that the development will not result in any direct impacts to listed buildings or locally listed buildings. As such it is reasonable that the scoping exercise is based on assessing which built heritage assets are likely to experience change to their settings resulting from the development project, during either construction or operation (and maintenance).</p> <p>It is noted, however, that several conservation areas (or parts of) fall within the Draft Order Limits (DOL) and so have the potential to be directly impacted by the development project. In these instances, a setting assessment only will not be sufficient. A full Heritage Impact Assessment should be conducted for conservation areas which fall within the DOL, as they are likely to have a direct impact upon their significance as a consequence of the proposals.</p>
<p><b>11.5.1 7</b></p>	<p>Vibration assessment: Any vibration assessment to extend to heritage assets within a 30m of the construction access routes, utility diversions, or works areas. It may be the case that heritage assets within the 30m buffer could experience impacts from vibration caused by HGV movements during construction phase. Commitments and recommendations regarding noise and vibration in terms of stopping work in the event of unacceptable</p>

	<p>impacts, monitoring vibration, and reducing vibration (or providing other mitigation) should form part of CoCP.</p> <p>Additionally, there may be benefits in commitment to the production of pre-commencement condition surveys which would provide a baseline from which any impacts could be identified and assessed.</p>
<b>11.5.1 9</b>	<p>The statement within the third bullet point suggests those buildings within settlements were scoped out based on a desk-based assessment rather than a site visit. Topography is very difficult to judge from a desk-based situation and these settlements should have been visited to make this sort of assessment.</p>
<b>11.5.2 3</b>	<p>The settings survey was conducted between autumn 2022 and summer 2023. It is unclear if future development, e.g., permitted schemes or partially constructed development, were considered, and informed the assessment.</p> <p>A thorough and detailed setting assessment based on up-to-date and relevant project design information is critical to understanding the contribution the setting of a heritage asset makes to its significance, how and to what degree the development project will impact on that setting and significance, and to informing any mitigation strategy.</p> <p>A review of the survey, assessing if any change has occurred which alters the conclusions, would be beneficial.</p>
<b>11.5.2 6</b>	<p>It is recommended that the consultation of historic maps is not limited to those listed; other local and regional maps are likely to be available.</p> <p>It is recommended that the use of historic photography to inform the ES is not limited to historic aerial photography.</p> <p>The inclusion of protected lane data is welcome; these also have the potential to be impacted by noise and vibration.</p>
<b>11.5.2 9</b>	<p>This suggests that each heritage asset has been subject to the sequential evaluation set in in HE's guidance GPA3: The Setting of Heritage Assets (2017). This is misleading if this has not been undertaken and this requires clarification. It is unclear if the assessment of setting (and the contribution it makes to the value [significance] of heritage assets) includes views towards, from and including heritage assets. This would be difficult to assess without a site visit.</p>

	<p>If so, for scoped in Listed Buildings and Conservation Areas (where the setting of the asset extends to the Draft Order Limits), relevant viewpoints should be taken forward for assessment as part of the LVIA (or ideally, a Heritage and Townscape Visual Impact Assessment).</p>
<p><b>11.5.3 1</b></p>	<p>It is acknowledged that any assessments are an iterative process which is subject to change and updates as the project design evolves. In this instance that process may require undertaking Steps 1, 2 and 3 of the assessment set out in Historic England's guidance <i>GPA3: The Setting of Heritage Assets</i> (2017), when design changes are considered; design changes may affect the accuracy of the Historic Environment Baseline Report.</p>
<p><b>11.5.3 4</b></p>	<p>Re-assessment should include any heritage assets which may have previously been scoped out due to distance etc. but have the potential to be impacted due to project design changes.</p> <p>NB: some designated heritage assets will not require new or re-assessment e.g., letter boxes, milestones, telephone kiosks, as they do not have settings that will be impacted. The typologies not requiring re-assessment can be agreed with National Grid.</p>
<p><b>11.5.3 5</b></p>	<p>Listed Buildings are a national designation and the value/sensitivity ascribed needs to reflect this in Table 5.1 (P.110) to assign a lesser weight would in turn skew the Matrix of Significance (Table 5.3 P.112) resulting in an under estimation of the significance of effects. This needs to be amended to reflect the statutory position.</p> <p>It should be noted that neither low heritage value nor a low magnitude of impact will negate the requirement for mitigation. The assessment of impact (expressed as Significance of Effect) should be translated into harm to significance in terms of the Department for Energy Security and &amp; Net Zero's Overarching National Policy Statement for Energy (EN-1).</p> <p>Where less than substantial harm is found to the significance of a designated heritage asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high. The scale of any harm or loss to the significance of non-designated heritage assets (NDHAs) should also be assessed and stated.</p>

<p><b>11.5.3 6</b></p>	<p>The commitment to consider any effects on the Historic Environment associated with mitigation proposals for other environmental receptors is welcome.</p>
<p><b>11.6.1</b></p>	<p>It is noted that the baseline conditions may not be accurate and are thus subject to change.</p>
<p><b>11.6.9</b></p>	<p>No narrative is provided as to how non-designated heritage assets (NDHAs) have been identified. Are those identified based on the HER and/or local lists only, or have further NDHAs been identified as part of the DBAs, site walkovers, and setting assessments? This will require clarification; further NDHAs may be identified throughout the NSIP process.</p>
<p><b>11.6.1 7</b></p>	<p>Due to the evolution of the project design since September 2023, there may be known and anticipated changes to the baseline. It is noted that the conclusions are subject to change at all times as a result of alignment or design changes.</p>
<p><b>11.7.3 -11.7.</b></p>	<p><i>Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.</i></p> <p>This should not be in lieu of mitigation measures that wholly eliminate risk or harm. Additional mitigation (beyond embedded and standard mitigation) should be targeted and site-specific and should be clearly evidenced to be as such.</p> <p>Table 4.2, Chap.4, Vol.1 (p.60) needs to set out specific mitigation measures to minimise harm to the setting of HA's. including: offsite planting to mitigate effects on key viewpoints to and from HA's (including CA's) and the micro siting of towers.</p>
<p><b>11.7.5 H03:</b></p>	<p>The impact of loss of any vegetation within 3km of the DoL should be carefully assessed. The loss of any vegetation that is cited as a justification for scoping out heritage assets for further assessment should be wholly avoided. Where it cannot be avoided, the relevant heritage asset must be re-assessed and steps 2, 3 and 4 of the Historic England's guidance <i>GPA3: The Setting of Heritage Assets</i> (2017) should be undertaken.</p>
<p><b>11.7.6</b></p>	<p>Additional mitigation above and beyond embedded and standard mitigation measures are required to reduce effects on a bespoke approach to individual assets to include: localised use of landform</p>



	sculpting and screen/filter planting to reduce intervisibility between HA's and the project towers.
<b>11.8.4</b>	Construction Effects: The assessment of the contribution of setting to the significance of non-designated heritage assets should be carried out as part of completion of the Environment Statement.
<b>11.8.1 0</b>	There is scope for further significant temporary negative effects on non-designated heritage assets to be identified once the contribution of setting to significance and the effects of the construction phase of development have been assessed.
<b>11.8.1 5</b>	The level of identified harm to the significance of each of the designated heritage assets should be expressed in terms of the Department for Energy Security and & Net Zero's Overarching National Policy Statement for Energy (EN-1). Where less than substantial harm is found to the significance of a designated heritage asset, the level of less than substantial harm should be assessed and stated on a scale ranging from e.g., very low to high.
<b>11.8.1 8</b>	The preliminary assessment identified 14 'not significant' permanent positive effects to listed buildings (in sections B, C, E and G) and one to a scheduled monument (in section B, Offton Castle 1006049). This is the result of removal of an existing overhead lines and replacement either with underground cable or the placement of the 2024 proposed draft alignment further away from the asset than the existing overhead line.  Are these to be identified as public (heritage) benefits arising from the scheme?

165. Preliminary Environmental Information Report: Non-Technical Summary (Chapter 5.7: Historic Environment)

166. Built Heritage Comments re: PEIR: NTS Chapter 5.7

<b>5.7.2</b>	The study area used is: 250m for non-designated assets, 2km for all designated assets, 3km for Scheduled Monuments, Grade I and GII* Listed Buildings and Registered Parks and Gardens.
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<b>5.7.4</b>	Mitigation to avoid and reduce significant effects are included in Table 4.2, Chapter 4 of Volume 1 of the PEIR. It is worth noting that the table makes no explicit reference to mitigation measures which change the impact of the proposal on the setting of heritage assets.
<b>5.7.5</b>	Standard mitigation is in Appendix 4:1, Draft Outline Code of Construction Practice. It is noted that this mitigation appears to only relate to archaeological assets. The document references informing the LPA if new heritage assets are discovered, or found to be more significant than thought, however this makes no reference to buildings, and is assumed to only refer to the uncovering of new archaeological finds, or if known find spots or features are larger/more significant than thought, when works occur.
<b>5.7.7</b>	A summary of findings is given: the construction phase will have significant temporary negative effects on 215 Listed Buildings, 5 Schedule Monuments, 6 Conservation Areas, 1 Registered Park and Garden.
<b>5.7.8</b>	There will be 223 'not significant' negative temporary effects to designated heritage assets.
<b>5.7.10</b>	During operation and maintenance 123 significant permanent negative effects are identified to: 119 Listed Buildings, 1 Scheduled Monument, 2 Conservation Areas and 1 Registered Park and Garden.
<b>5.7.11</b>	Significant permanent negative effect is summarised as an impact which 'would affect an element of their setting that makes a notable contribution to their value.'
<b>5.7.12</b>	An additional 178 designated assets will experience 'not significant' permanent negative effects: 167 Listed Buildings, 4 Scheduled Monument, 7 Conservation Areas.
<b>5.7.12</b>	There will be 'not significant' permanent positive effects to 14 Listed Buildings and 1 Scheduled Monument. This is due to undergrounding/ movement of existing pylons further away.
<b>5.7.13</b>	Re. the Waveney Valley Alternative: it is concluded that there will

<b>-14</b>	<p>be no additional significant effects if the alternative is used. If taken forward, the alternative will include the reinstatement of historic field boundaries, which reduce the effect from significant to neutral. Further information is required on this matter particularly how field reinstatement can truly negate the impact of new cable routes.</p>
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167. Appendix 11.1 Historic Environment Baseline Report
168. Within this document a 'baseline' chronological description is provided for the Project area, broken into eight geographical regions (A-H). The location, topography, geology, historic landscape, archaeological and built heritage assets of each section are described. This is split into time periods and includes brief descriptions of some listed buildings or non-designated buildings and their settings.
169. Section C includes Babergh District, Colchester City and Tendring District Councils; Section G contains both Brentwood and Basildon Borough Councils. Whilst it is appreciated that these districts may share similarities in terms of their topography and geology, for example, for ease of assessment by the LPAs it is recommended that each section relates to a single local planning authority only.
170. Non-designated heritage assets described within this document appear to be largely taken from HER data, and as a result the non-designated heritage assets identified and described are primarily archaeological sites or find spots. It is unclear if the walkover survey identified any buildings which could be considered non-designated heritage assets; this information must be included as part of the ES chapter (as per para. 1.5.4). The document states that LPA websites have been viewed for information on Locally Listed Buildings, yet in the baseline document and the gazetteer (Annex B) it is unclear which non-designated heritage assets are on a local list.
171. If it is agreed that all designated heritage assets are of high value (see comments above relating to the PEIR document), the Baseline Historic Environment Report will require amendment to reflect this. Re-assessment of non-designated buildings described in the text is also required; there may be some non-designated buildings which can be considered of medium significance, due to their regional importance.
172. Appendix 11.1 Historic Environment Baseline Report: Annex B Gazetteer
173. As per comments above, Sections A-H should be divided by individual district and not grouped.

174. The Gazetteer should also be updated to include a column which specifies if a building is locally listed.
175. A further column which differentiates between each type of non-designated heritage asset (e.g. find spot, crop mark, building, pill box) etc is also required.
176. Appendix 11.1 Historic Environment Baseline Report: Annex C Cultural Heritage EIA Methodology Document
177. Decommissioning effects have been scoped out of this assessment, due to the length of time in which the Project is expected to operate, and because decommissioning is expected to seek appropriate consent when it occurs. This approach is considered acceptable subject to the provision of a guarantee within the DCO that decommissioning of the project will require appropriate assessment.
178. It is unclear if conservation area appraisals have been considered. These are not included in the list of consulted sources outlined in paragraph 3.3.2. Local lists are also not included in the list of reference sources.
179. At paragraph 3.4.2, it is stated that the Baseline Report has been split based on archaeology, built heritage and historic landscape characterisation. This is incorrect; the baseline report is split between time period, with sub-categories of designated and non-designated heritage assets. The methodology or baseline report should be updated to ensure the documents reflect each other. A split as per the methodology (between archaeological, built and landscape features) is recommended.
180. Table 3.1 indicates Proposed Gazetteer Headings, which includes a column for Monument Type and Asset Group – neither of which are included in the submitted Gazetteer. Inclusion of these columns would address comments given above.
181. The Walkover Survey (section 3.6.4 and 3.7) is archaeologically focused. Consideration must be given to the potential for built non-designated heritage assets to be present throughout the order limits and particularly in districts where there is no Local List. As per comments on the main PEIR text, there is concern that non-designated built heritage assets are likely to be missed and not assessed based on the current methodology.
182. Table 1.2: This will require amendment, if agreed, to place Grade II listed buildings in the High, rather than Medium, category.
183. Table 2.1: Criteria for quantifying the magnitude of impact to heritage assets. The descriptions and magnitude of impact are agreed.

184. In Section 5: Mitigation, no proposals for mitigation are given, it is only stated that mitigation ‘will be proportionate’. Examples would be beneficial – for example has the alignment taken into consideration the setting of heritage assets, is there scope for the relocation of pylons, or would additional planting or screening be beneficial?
185. Appendix 11.2 – Historic Environment Assessment Tables
186. As per comments above it is recommended that Sections A-H are divided by individual LPA.
187. The inclusion of the address (either the full address or post code, as a minimum) for all assets would be beneficial. Whilst the Easting and Northing are included in the Gazetteer, the assessment tables simply refer to an asset by name.
188. The assessment tables require updating to reflect an updated value for all heritage assets, if the approach recommended above (that all designated heritage assets are of high value) is agreed.
189. As a general note, it would be preferred if all thematic meetings occur with Historic England present, as well the local authorities’ conservation officers. There may also be occasions when it would be beneficial for other statutory consultees, such as National Landscapes, to also be present, particularly in instances where impacted landscapes form part of the setting of a designated heritage asset, for example.
190. Historic Environment comments - Historic Environment Baseline Report (Colchester)

<p><b>Para 3.5 Section D</b></p>	<p><i>Colchester City</i></p> <p>Colchester City has a large section of undergrounding to the north of Colchester, once again cutting through cropmark complexes. Any geophysics survey will need to be checked and enhanced by aerial rectification prior to the trial trenching. It is pleasing to see that the heritage assets dating to the Late Iron Age and those of a Roman date have been assessed in the context that any occupation of these dates need to be identified in association with the Oppida and Roman town at Colchester. This will help put the heritage assets of this date within their setting.</p> <p>The site at Ford Street (4078) has not been given a value, although in the table this is regarded as a significant site and is recorded as being of medium value.</p>
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	<p>Is cumulative value being considered, such as in the case of the complex at Teybrook Farm, this had a complex of 16 buildings, with at least half still surviving, seven of which are listed. This is still only given a medium value as they are grade II listed.</p> <p>There is also concern about associated heritage assets and how they are considered. In the case of a moat at Little Tey House this is regarded as Low value, however, the designated house within the moat is given a medium value. As a minimum it would be useful where complex sites which have a number of either designations or references in the HER are dealt with as single complexes even if different values are given.</p>
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## 191. **Hydrology and Land Drainage**

192. The Council will defer to the Environment Agency and the Lead Local Flood Authority (LLFA) in this case the Essex County Council Drainage Team for Hydrology and drainage matters. **The LLFA have noted the following:**
193. The LLFA recommends the drainage proposal for the areas under Essex would comply with [SuDS Design Guide](#). The proposal should assess the areas susceptible to surface water flooding and requires appropriate measures to mitigate any adverse impacts during the construction phase, including any implication associated with existing drainage interruption/blockage or temporary diversions.
194. We would wish to see a construction management strategy submitted. This should include such things as;
195. Any temporary works (culverts) to ordinary water courses/drainage channels for the purpose to give access to the project location.
196. The surface water management during the construction of office, storage compounds.
197. Required mitigation to prevent onsite/offsite flooding.
198. Measures taken to prevent any pollutants entering surface water or ground water.
199. Appropriate measures to deal with spills and leakages onsite.
200. Proposal for surface runoff disposal during construction phase and from the built area's (offices, storage compounds) will need to be in accordance with SuDS Design Guide 2020. Surface water runoff from permeant built-up areas should be managed on site using infiltration or runoff should be restricted to 1-year greenfield rates, network modelling should be done for 100 years plus

climate change allowance. Unrestricted runoff from the site into any open water body or sewer is not recommended.

201. Consent will be required for the areas where the project will have direct or indirect effect on drainage channels, or ordinary water courses : Section 23 of the Land Drainage act (1991).
202. Essex County Council as LLFA also supports the Trenchless construction method. Essex County Council as LLFA recommends geotechnical investigations and surveys should be undertaken to understand existing ground conditions and any risk associated to trenchless construction method for proposed land.
203. Comments on the Preliminary Environmental Report Vol 1:
204. 4.8.62 - Watercourse crossing, culverts will require Sect 23 consent [Maintaining or changing a watercourse \(essex.gov.uk\)](http://www.essex.gov.uk)
205. 6.6.5 - There is mention of the types of soils in the development area. Details will be required regarding infiltration capacity and whether tests have been undertaken ?
206. CG01- The SuDS Design Guide should be included in this list : [The Drainage Hierarchy | Essex Design Guide](#)
207. GG34- Refers to “stone pads”, reference should be made to these in the drainage strategy ie) size of the pads and what measures are to be provided with regard to run off, if any.
208. GG40- It should be considered how the haul roads will deal with surface water and how the runoff will be treated.
209. W01- Work undertaken on watercourses will require Sect 23 consent (link given above)
210. W02 – A construction management plan will be required, to evidence how surface water will be dealt with during the construction phase.

211. W07- Construction that takes place within a flood zone should ensure that the risk of downstream flooding is mitigated.
212. W09 -Measure should be taken during construction to mitigate the risk of offsite flooding. The drainage strategy should explain how standing water during the construction phase will be dealt with.
213. W10 – Where construction haul roads cross watercourses Sect 23 consent will be required.
214. AS10 – Where topsoil is removed suitable measures should be taken to ensure surface water runoff is not increased.

## 215. **Landscape and Visual**

216. This response in relation to landscape issues has relied primarily on the following documents made available as part of the Statutory Consultation April 10th to June 18th 2024.
217. Design Development Report and appendices
218. Preliminary Environmental Information Report Volume 1 and 2
219. Summary of Comments
220. The PEIR acknowledges that the proposals will have a significant negative landscape and visual impact at both construction and operational stages over the length of the Project. This is identified as up to 1Km from the Project line in many situations.
221. We consider that based on the information supplied, that significant negative impacts could occur at a greater distance from the Project than that identified, including on intangible landscape assets at the operational stage.
222. The limited number of viewpoints and visualisations that are proposed over the length of the Project needs to be reviewed. In particular, more assessments need to be carried out beyond 1Km from the Project in order to demonstrate assertions regarding extent of significance.
223. The preliminary LVIA does not appear to include details of the agreed criteria on which the assessment judgements are based. Without details of these criteria, it is hard to appraise whether the impacts are significant or not. Where negative effects are judged not to be significant the experience of receptors is still likely to be negatively affected over a wide area, reducing aesthetic enjoyment, the sense of place, history and identity, and



inspiration for learning.

224. In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding or re-routing is required particularly in river valleys to protect valued local landscapes, long-distant rights of way and rural amenity sites.
225. In order to assess where alternative proposals for undergrounding should be put forward, a Valued Landscape Assessment must form part of the Landscape and Visual Impact Assessment along the length of the Project, to be submitted with and inform the future EIA. The scope must be agreed with CCC prior the work being carried out.
226. Should the Project go ahead, a substantial funded landscape compensation scheme, as opposed to community benefits, is needed, to off-set the long-term significant negative un-mitigatable construction and operational effects on both landscape and visual receptors that this Project will generate. Compensation is promoted in National Policy EN5.
227. We have identified a number of areas where we believe data presentation could be improved in order to aid access and interpretation.
228. Any previous consultation comments pursuant to previous non-statutory consultations made with regard to landscape and visual issues have not been referenced here but should be taken as still relevant.
229. We have not made reference in detail about issues relating to vegetation removal but it is expected for these to be fully quantified and identified in developing the EIA submission.
230. Review of Submitted Information
231. The submission consists substantially of the Preliminary Environmental Information Report and its Appendices, the Design Development Report and its Appendices, as well as background documents, consultation reports and materials.
232. The approach to the preliminary Landscape and Visual Impact Assessment is identified as in accordance with the 'Guidelines for Landscape and Visual Impact Assessment,' Third Edition (GLVIA3, 2013). Whilst this appears to be broadly the case, the PEIR itself, in Volume 3 Technical Appendices - Part 4 of 4, Appendix 13.1 and 13.2, does not appear to include details of the agreed criteria on which the assessment judgements are based. i.e., for the sensitivity (susceptibility and value) of the landscape and the visual receptors, nor for the magnitude of the effects. It is not clear whether a preliminary judgement on significance has been determined without going through the stage of identifying susceptibility and magnitude of effects or whether this stage has been carried out but not shared.

233. The Project runs through one National Landscape (Dedham Vale National Landscape) and the Stour Valley Project Area. County, district and local level landscape protection is no longer government policy, and few Valued Landscape Assessments have been carried out at a district or local level.
234. Policy
235. National Policy Statement for Electricity Networks Infrastructure (EN-5) (November 2023) is clear on the importance of the mitigation hierarchy in Critical National Policy projects which includes onshore electricity networks. In paragraph 2.16 it states that:
236. 'The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged...' Our underlining.
237. Whilst the government's presumption is for overhead lines for onshore power lines, it is recognised in Paragraph 2.9.7 of EN5 that '... in practice new overhead lines can give rise to adverse landscape and visual impacts.' Our underlining.
238. Paragraph 1.1.12 of the PEIR recognises the need for environmental compensation beyond BNG 'There would also be land required for mitigation, compensation and enhancement of the environment including Biodiversity Net Gain (BNG).'
239. Landscape Value
240. In rural landscapes, through which the Norwich to Tilbury route is substantially planned, the default preferred alignment, as promoted by the Holford Rules, is to avoid routing close to residential areas as far as possible on grounds of general amenity. This is interpreted as including individual rural properties, as well as avoiding protected heritage assets. Whilst nationally protected landscapes and their settings, have the benefit, in landscape and visual terms, of proposed cabling being substantially undergrounded, the remaining undeveloped landscapes along the route, are not generally identified as being a constraint when it comes to alignment, even though some of these are of strong local character. Many of these landscapes will have value at a local level but not have the benefit of local landscape designation as this approach is not preferred policy at a national level (and hasn't been for several decades) and thus successive Local Plans have discarded local protections.
241. Lack of local landscape designation does not imply lack of landscape qualities or value. The current Holford Rules advise 'Where possible choose routes

which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.’ And yet districts which adhere to national policy on local landscape protection and base their policy on local landscape character assessments not designation are effectively penalised via this advice. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national landscape policy and guidance.

242. The treatment of undesignated landscape as blank space is compounded by adherence to Rule 5 of the Holford Rules which states that in routeing of high voltage overhead transmission lines, these should ‘... be kept as far as possible from smaller lines, converging routes and other poles, masts, wires, and vales to avoid a concentration or ‘wirescape’. This has the perverse effect of distributing adverse impacts over a wider area of unspoilt countryside rather than containing them in a narrower corridor.
243. Whilst existing landscape character assessments in the region may have some analysis of value, such data is not necessarily consistent with current understanding of valued landscapes and does not necessarily reflect current understanding of landscape in terms of sense of place and identity, cultural heritage, artistic inspiration, sustainability nor mirror current policy.
244. The Landscape Institute produced guidance on how to assess landscape value in 2021. The guidance clarifies that landscape value is the relative value or importance attached to different landscapes by society on account of their landscape qualities. We judge that an up-to-date assessment of landscape value along the proposed swathe is required in order to understand what we have in terms of valued landscape and what will be lost in the process of creating a substantially overhead cable route in the east of England. A valued landscape assessment must form part of the Landscape and Visual Impact Assessment carried out through the future EIA.
245. Compensation
246. Paragraph 15.5.14 of the PEIR confirms that ‘Compensation matters are not addressed within the PEIR and will be dealt with separately as part of the DCO process...’ This is at odds with EN5’s requirement, stated above that ‘...early application of the mitigation hierarchy is strongly encouraged...’ We do not think it is acceptable to treat compensation separately from the PEIR particularly when significant, un-mitigatable landscape and visual impacts are being identified over such a wide area. The term ‘compensation’ is barely used in the PEIR.
247. Cumulative Effects
248. The PEIR identifies schemes short-listed as having potential cumulative

effects on receptors. We surmise some of these could have implications for this assessment area by virtue of their location. We surmise the following could have implications for this assessment area by virtue of their location:

249. Bramford To Twinstead Reinforcement
250. Five Estuaries Offshore Wind Farm
251. North Falls Offshore Wind Farm
252. Mangreen Quarry, Ipswich Road, Dunston, NR14 8DD
253. Brockley Wood Land off A12, Belstead, Suffolk, IP8 3JS Babergh DC
254. Land North Of The A1071, Ipswich, (Wolsey Grange)
255. Anglian Water services Bury to Colchester Pipeline
256. Bramford Solar Farm and Battery Storage Facility
257. Land West of Blacksmiths Lane Earl Stonham (Solar Farm)
258. Land North of Lion Road Palgrave (Solar Farm)
259. We anticipate seeing assessment of how these schemes affect or not landscape or visual issues in the LVIA in the EIA. Mapping of these proposals would assist with understanding and review.
260. Visual Assessment – General
261. The preliminary LVIA overall has been supported by 89 Photographic Viewpoints and Wireline visualisations including Landscape, Visual and Heritage. Figures 13.7 Landscape and Visual Receptors identify potential additional/alternative viewpoint locations that will be considered for the Environmental Statement (ES). Additional Historic Environment Viewpoints are also identified.
262. We consider that 89 Photographic Viewpoint assessments and Wireline visualisations are wholly insufficient for a scheme of this size where there is anticipated significant negative landscape and visual effects over a likely minimum width of 1Km from the Project line in both directions. That is less than one every two kilometres, and effectively means one every 4Kms on alternating sides of the scheme. The scale of effects on local landscapes and receptors cannot be captured and demonstrated at this level. All the additional potential viewpoints shown on Figures 13.7 Landscape and Visual Receptors should also be assessed as well as in those places mentioned elsewhere in this text, for example, between the 1-1.5Km distance where the question of significance of effect is debated.
263. In accessing and trying to appraise the information provided we encountered several issues which we hope can be resolved before the ES is submitted.

These are listed below.

264. Some of the location labelling on the visualisations is non-specific i.e., identification of a place name but with no road name or PRow number, or a PRow is indicated but a number isn't given.
265. The location maps for the viewpoint visualisations have a satellite rather than an OS base which is hard to read, especially in the field.
266. The visual receptor maps are very small-scale (1:50,000) and therefore hard to read in the field. It would be preferable if the VPs could be identified on a 1:10,000 baseline such as is used for the Proposed Project Design Maps i.e., Figures 4.1
267. Wireline visualisations e.g., Volume II: Figures Part 18 of 27: Figures 13.9.51 - 13.9.56 - Wireline Visualisations. It would be preferable if, in the next iteration of the documentation, these figure volumes could be labelled by route section and/or district in such a way that it is easier to tell which section of the route they relate to before opening.
268. The preliminary LVIA does not appear to include details of the agreed criteria on which the assessment judgements are based. i.e., for the sensitivity (susceptibility and value) of the landscape and the visual receptors, nor for the magnitude of the effects. Without details of these criteria, it is hard to appraise whether the impacts are significant or not.
269. Indicative layouts and elevations for the SECs and EACN would be helpful to convey the scale of these rather than just descriptions.
270. The file sizes and document formatting make viewing and analysing the plans difficult and time consuming; an alternative approach to plan formatting should be explored and considered.
  
271. Landscape
272. This response in relation to landscape issues has relied primarily on the following documents made available as part of the Statutory Consultation April 10th to June 18th, 2024.
273. Design Development Report and appendices
274. Preliminary Environmental Information Report Volume 1 and 2 particularly:
  - a. Figure 13.1, 13.5, 13.6, 13.7
  - b. Figures 13.8.1 to 13.8.11
  - c. Figures 13.9.1 to 13.9.89
  - d. PEIR, Volume 3 Technical Appendices - Part 4 of 4, Appendix 13.1 and 13.2

275. Landscape Character Baseline and Assessment
276. *National Character Assessment*: The Project runs through two National Character Areas within the Essex authorities (Excluding Thurrock for the purpose of this response):
277. NCA 86 South Suffolk and North Essex Clayland
278. NCA 111 Northern Thames Basin
279. *East of England Landscape Typology*: The East of England Landscape Typology (Landscape East, 2010) is a regional level study which identifies Landscape Character Types (LCTs) across the East of England.
280. The Project runs through the following East of England typologies in the Essex authorities:
281. Valley Settled Farmlands
282. Valley Meadowlands
283. Plateau Estate Farmlands
284. Wooded Hills and Ridges
285. Wooded Plateau Farmlands
286. Lowland Settled Claylands
287. **Despite the scale of the project, it does not appear as though the effects of the Project on national or regional landscape character have been assessed.** We question the judgement of this approach considering this is a proposal that is identified as having significant negative operational landscape effects along the length of the approximately 159 km of new overhead line.
288. *District / County Landscape Character Types and Areas*
289. The landscape of the study area is described within a series of district and county level landscape character assessments identifying Landscape Character Types (LCTs) and Landscape Character Areas (LCAs). The PEIR contains a preliminary assessment of effects on LCAs and LCTs during construction and operation on the county level assessments.
290. The landscape character assessment covering Colchester is:
291. Colchester Borough Landscape Character Assessment (2005)
292. The Colchester Borough Landscape Character Assessment identifies 15 No. LCAs along the Project line including 3 No. sub-areas of the Stour River Valley Slopes. The preliminary Landscape and Visual Impact Assessment suggests that significant effects would likely be substantially limited to within 1 Km of the Project, generally at both construction and operations stages.

Whilst accepting that at construction stage this is likely to be the situation, it is not accepted that this would be the case at the operational stage where the outcome is generally an overhead line with 50m pylons as opposed to undergrounding, and where intervisibility is frequently quite high.

293. The visualisations demonstrate that within Colchester City Council's boundaries, the landscapes affected by the Project are substantially undeveloped, rural landscapes where intervisibility can be quite high due to large scale flat or gently undulating landscapes with undeveloped river valleys, where the scale of the pylons and overhead wires means the effect will potentially significantly industrialise the countryside in places up to 2Km away. These are often landscapes without existing significant detractors.
294. Even where the effects are deemed not significant, the character of the landscape is changed over a much wider area, with proposed overhead lines reducing the provision of what GLVIA3 (Page 18. Para 2.11) describes as:
295. Opportunities for aesthetic enjoyment
296. A sense of place and a sense of history which contributes to individual, local, national and European identity.
297. Inspiration for learning, as well as for art and other forms of creativity
298. In relation to specific Landscape Character Areas:
299. LCA B7: Langham Farmland Plateau: The Langham Farmland Plateau LCA encompasses the area around Langham and Dedham Heath, extending south of Langham to the A120 on the outskirts of Colchester. A small part of this LCA is located within Dedham Vale National Landscape (an AONB). Central and southern parts of the Langham Farmland Plateau LCA would be directly affected due to proposed underground cables between Lamb Corner and Langham and proposed overhead line through the former airfield south of Langham and east of the A12. It is identified that the effect on the LCA would likely be significant (negative) within approximately 1 km of the draft Order Limits at the construction stage. The only wireframe in this character area to the west of the A12 appear to be VP4.01 which is sited 1.2Km away. This demonstrates how much of an effect can be from >1Km, and it is likely there would be significant effects from > 1.2Km away towards the end of the construction period as the tops of the pylons and the overhead lines are attached. We therefore do not agree that the significant effects at the operational stage would be limited to < 1Km. We would need to see assessments and visualisations from VP 4.17 and 4.18 which are in the character area but closer to the pylon run to get a better idea of the widespread nature of the effects.
300. LCAA8: Stour River Valley Floor: The Stour River Valley Floor LCA is

located along the south side of the River Stour, west of Stratford St Mary and east of Dedham. It comprises three geographically separate parts and is almost entirely located within Dedham Vale National Landscape (an AONB). A small portion of the central part of the Stour River Valley Floor LCA (west of Stratford St Mary and north of Langham) would be directly affected at the construction stage. The effect on the LCA is identified as likely significant (negative) within approximately 1 km of the draft Order Limits at construction stage and the effect on the LCA at an operational stage is identified as likely negative but not likely significant. We generally agree with this judgement. However, we would seek to caveat this with the result of any judgements made on the severity of the impact on the special qualities of the National Landscape.

301. LCA A7: Stour River Valley Slopes: The Stour River Valley Slopes is located to the south of the Stour River valley floor and includes the settlement of Boxted and Langham Hall and is almost entirely located within Dedham Vale National Landscape (an AONB). There appear to be no viewpoint assessments in this area. A short linear section of the Stour River Valley Slopes LCA to the southwest of Stratford St Mary would be directly affected by construction activity. The effect on the LCA is identified as likely significant (negative) within approximately 1 km of the draft Order Limits at construction stage and the effect on the LCA at an operational stage is identified as likely negative but not likely significant. We generally agree with this judgement. However, we would seek to caveat this with the result of any judgements made on the severity of the impact on the special qualities of the National Landscape.
302. LCA Sub Area A7a: Stour River Valley Slopes: The Stour River Valley Slopes LCA has a sub area (A7a) which is centred on small streams near Vinesse Road, to the south of Little Horkesley, approximately half of which is located within Dedham Vale National Landscape (an AONB). The Stour River Valley Slopes LCA sub area A7a would not be directly affected by construction activity. There appear to be no viewpoint assessments or visualisations in the sub character area. The effect on the LCA is identified as likely significant (negative) within approximately 1 km of the draft Order Limits at construction stage and the effect on the LCA at an operational stage is identified as likely negative but not likely significant. We generally agree with this judgement. However, we would seek to caveat this with the result of any judgements made on the severity of the impact on the special qualities of the National Landscape.
303. LCA Sub Area A7b Stour River Valley Slopes: The Stour River Valley Slopes LCA has a sub area (A7b) which is centred on Black Brook to the north of Langham a small part of which is located within Dedham Vale National Landscape (an AONB) A section of the Stour River Valley Slopes



LCA sub area A7b to the north of Langham would be directly affected by construction activity. Alongside other construction activity, there would be a notable loss of trees within the construction swathe including a linear block of woodland in a field to the east of Springfield Farm, a section of woodland immediately north of Black Brook, riparian vegetation either side of the brook and overgrown hedgerows with hedgerow trees to the east of Grove Farm. The effect on the LCA is identified as likely to be significant (negative) within approximately 1 km of the draft Order Limits during construction. There would be a long-term direct effect on landcover pattern and connectivity, most notably due to the fragmentation of tree cover along Black Brook. This would affect the key characteristic of the 'intimate tranquil, relatively steep-sided river valley which is narrow in places and has the narrow meandering Black Brook running through the floodplain' with significant (negative) effects within approximately 1 km during operation. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected strongly at a local level. From the information given it is unclear if these long-term significant effects are within the National Landscape as the character sub areas are not clearly marked on the landscape character maps. The approach needs to be rethought if such significant residual negative effects in a National Landscape remain.

304. LCA Sub Area A7c: Stour River Valley Slopes: This LCA has a sub area (A7c) which is centred on small streams and ponds to the north of Workhouse Hill, a small part of the area is located within Dedham Vale National Landscape (an AONB). Although the draft Order Limits just fall within 1 km of the Stour River Valley Slopes LCA sub area A7c it is unlikely that construction activity would be perceptible due to intervening landform, buildings, and layers of vegetation. It is judged that there would likely be no effect on the LCA at the construction stage and it is judged that there would likely be no effect on the LCA once operational. There are no apparent viewpoints proposed from the edge of the AONB in this area and we judge it would be beneficial to do this to demonstrate no intervisibility and the proposed Project line.
305. LCA B5: Rochfords Farmland Plateau: The Rochfords Farmland Plateau LCA is located to the south of the Stour Valley and includes the settlement of Wormingford. Northern parts of the LCA fall within Dedham Vale National Landscape (an AONB) A small part of the eastern fringe of the Rochfords Farmland Plateau LCA would be directly affected by construction activity between Vinesse Road and Highfield Farm. A CSE compound and associated gantries would be introduced to a localised part of the LCA. There would be disturbance to the 'open and exposed' character of the LCA. It is identified that the effect on the LCA would likely be significant (negative) within approximately 1 km of the draft Order Limits

at construction. In the longer term, proposed planting within the Environmental Area around the CSE compound would reduce effects. The effect on the LCA would likely be significant (negative) within approximately 1 km of the Project once operational. Generally, we agree with this judgement.

306. LCA B6: Great Horkesley Farmland Plateau: This LCA is located to the north of Colchester and includes the settlements of Great Horkesley and West Bergholt and a small section of the northern part of this LCA is located within Dedham Vale National Landscape (an AONB). A central part of the Great Horkesley Farmland Plateau LCA would be directly affected by construction activity across a large section from the western edge of the former airfield at Langham to Vinesse Road, southwest of Little Horkesley. A CSE compound is to be created. The effect on the LCA would likely be significant (negative) within approximately 1 km of the draft Order Limits. Once operational a central part of the character area would be directly affected by the Project and where the CSE compound would also be located. Whilst there are existing detractors close to the A12 such as the road itself, large commercial buildings and telecoms masts, closer to the Project line, i.e., < 1Km, still has an air of rurality. We agree the Project would introduce a large-scale overhead line into a small to medium scale landscape. Whilst in the longer term, proposed planting within the Environmental Area around the CSE compound would reduce negative effects these are likely to remain significant due to its sheer scale and height. We agree the effect on the LCA would likely remain significant (negative) within approximately 1 km of the Project.
307. LCAA5: Colne River Valley Slopes: This LCA is located either side of the River Colne to the west of Colchester. A central part of the Colne River Valley Slopes LCA would be directly affected by construction activity, to the east of Fordham and Fordstreet crossing the River Colne. During construction there would be disturbance to farmland and open access land (3 No pylons are due to be sited on the Access Land with the overhead line oversailing the land), and a loss of hedgerows, hedgerow trees, semi-mature and mature field trees, clumps of woodland/scrub and recently planted young woodland in open access land to the south of Fordham and riparian vegetation along the River Colne. This is judged to cause a disturbance to the 'attractive and open' character of the LCA. Even though the valley sides of the Colne are quite steep at this point, we do not accept that beyond 1Km, the valley topography and layers of vegetation including woodland, riparian vegetation, hedgerows, and field boundary trees would reduce intervisibility within the wider LCA, nor reduce the significant effects, due to the height of the infrastructure towards the end of the construction period and at operation.

308. We judge that there will be long views from Mill Road, the Essex Way, the PRow network to the west of Hillhouse Woods, within the Open Access Land itself, from the PRow east of the Shoulder of Mutton at Ford Street (where the pylons parallel the Essex Way for 700m at only 200-300m distance), from the PRow network on the south side of the Colne north of Porters Lane. The alignment appears to take almost the longest route that could be chosen along the Colne Valley slopes. This area used to be a Special Landscape Area and would likely be identified as Valued Landscape if an assessment was carried out. It is the most accessible section of unspoiled riverside landscape to the west of Colchester and used extensively by walkers. We judge that a Valued Landscape Assessment must be carried out, and the opportunity for either realignment north and west of the Open Access Land explored or undergrounding be proposed as an alternative.
309. LCAA4: Colne River Valley Floor: This LCA is located along the River Colne to the west of Colchester. A narrow part of the Colne River Valley Floor LCA would be directly affected by construction activity to the east of Fordstreet. As above we judge the significant effects would be more widespread, both towards the end of the construction period and during operation, as this is an unspoiled river valley and views in and out of the valley, including from Mill Lane and along the Essex Way that follows the river for some distance, are quite widespread. This area used to be a Special Landscape Area and would likely be identified as Valued Landscape if an assessment was carried out. It is the most accessible section of unspoiled riverside landscape to the west of Colchester and used extensively by walkers. We judge that a Valued Landscape Assessment must be carried out, and the opportunity for undergrounding proposed as an alternative. If it must be overhead lines, then either realignment north and west of the Open Access Land explored or undergrounding be proposed as an alternative.
310. LCA B4: Great Tey Farmland Plateau: The Great Tey Farmland Plateau LCA is located to the south of the River Colne and contains the settlements of Great Tey and Aldham. The eastern part of the Great Tey Farmland Plateau LCA would be directly affected by construction. The preliminary assessment identifies there would also be disturbance to the 'peaceful and tranquil' character of the LCA. The LCA would also be indirectly affected by the construction activity, which it is identified would be perceptible within approximately 1 km of the draft Order Limits. VP4.10 at Great Tey shows how, even at 1.6Km, the effects of the overhead line are significantly negative over a wide area once operational. We cannot support the assertion, therefore that, significant effects only occur within 1.0Km of the Project line. An assessment and visualisation should be prepared for VP 4.15 or 4.22 where there are wide views of the proposals, or on one of the

PRoW closer to the scheme between 1-1.5KM.

311. LCA B2: Easthorpe Farmland Plateau: The Blackwater and Brain Valley LCA is located to the west of Colchester and contains the settlements of Marks Tey and Copford. The northern part of the Easthorpe Farmland Plateau LCA would be directly affected by construction activity, north of Marks Tey and Little Tey and running broadly parallel to the north of the A120. The effect on the LCA is judged likely be significant (negative) within approximately 1 km of the draft Order Limits. However, VP 4.12 which views the Project from 1.2Km shows that the effects are still significant. Therefore, we cannot agree that once operational the effect on the LCA would only likely be significant (negative) within approximately 1 km of the Project.
312. LCA A2: Wooded Roman River Valley: The Wooded Roman River Valley LCA is located along the Roman River to the south of Colchester. As the draft Order Limits fall only just within 2 km of the Wooded Roman River Valley LCA it is unlikely that construction activity or the finished Project would be perceptible. We agree with the judgement that there's likely no effect on this LCA.
313. LCA B3: Southern Colchester Farmland Plateau: This LCA is located to the southwest of Colchester. The draft Order Limits would be more than 2 km from the Southern Colchester Plateau LCA and is not likely to be perceptible. We agree there would likely be no effect on the LCA during construction nor during operation.
314. LCA F1: Messing Wooded Farmland. The draft Order Limits and finished Project line would be more than 2 km from the Southern Colchester Plateau LCA and is not likely to be perceptible. We agree with the judgement that there would likely be no effect on the LCA.
315. Visual Assessment
316. *Theoretical visibility of Project*
317. Section D is located broadly between the north-east of Colchester and Marks Tey in the south-west and therefore captures most of Colchester City Council's effects. The landscape comprises plateau farmlands incised by valley slopes associated with the River Colne and its tributary valleys which run through the middle of the area from Colchester to Halstead as well as gently sloping to flat areas around the edge of Colchester. The ZTV indicates relatively widespread theoretical visibility of the overhead line within the 3 km study area in Section D. This includes theoretical visibility from parts of settlements including Boxted, Great Horkeley, Wormingford, Eight Ash Green, Aldham, Fordham and West Bergholt. There is theoretical visibility from the PRoW network and parts of the Essex Way long distance path as well as parts of NCN 1 and NCN 13 in the north-east and across the middle of

the study area there is theoretical visibility from the road network. There would be theoretical visibility of up to 70 pylons from small parts of the study area in Section D. This would include the more elevated parts of the study area, including between Coggeshall (in Section E) and elevated land east of Great Tey. Visual effects of numbers of pylons are reduced in the river valleys, and through intervening topography and vegetation. However, this highlights how widespread the potential significant negative landscape and visual effects of the scheme are.

318. Theoretical visibility of CSE Compounds south of Dedham Vale National Landscape (an AONB) in Volume II indicates that theoretical visibility of the CSE compounds in Section D would be relatively widespread within approximately 1 km of each CSE compound, with more intermittent theoretical visibility between 1 km and 3 km. Theoretical visibility is also indicated from the fringes of Dedham Vale National Landscape (an AONB) including from parts of Wormingford.

319. *Visual Receptors and Groupings*

320. The preliminary LVIA groups the viewpoints where visual receptors have been grouped according to Visual Receptor Areas. These Visual Receptor Areas have been identified based on geographical location, shared landscape characteristics and a similarity in the nature of views.

321. We understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. It would be expected that the groupings might follow the landscape character areas or types far more closely.

322. *Visual Receptor Area D*

323. D1 Tye Green and Boxted: This Visual Receptor Area is located to the north of the Project, broadly between the farmland south of Langham and to the east of Little Horkesley and the northern part is located within Dedham Vale National Landscape (an AONB). The only Representative Viewpoints in this receptor area is:

324. Viewpoint 4.02 Oldhouse Lane PRoW

325. The assessment identifies that construction activity would be visible in close views from the south of the Visual Receptor Area as it runs along the southern boundary. During construction, we agree that it is likely that effects on visual receptors would likely be significant (negative) within approximately 1.0 km of the draft Order Limits. It is likely that the enormous impact of access for construction and operational purposes and the temporary and permanent haul roads throughout the Project merits the creation of a haul road decommissioning plan so that the effects of this infrastructure's removal is

also understood.

326. At operation, within approximately 0.5 km it is identified that there would be close views of the overhead line and a CSE compound from scattered properties, including properties along Straight Road, the local PRoW network NCN Route 1 and people travelling along the A143 and local road networks. Pylons would remain prominent in the view. Between approximately 0.5 km and 1 km, there would be close to medium views of the Project from scattered properties and the local PRoW and road network. Between approximately 1 km and 2 km, it is stated that views of the Project would likely be filtered and screened by layers of vegetation including woodlands and hedgerows resulting in intermittent medium to long distance views from scattered properties, a number of local PRoW, the Essex Way and roads. However, at VP 4.01 Boxted Airfield Memorial, which is to the south of the Receptor Area D1 and to the north, the pylons to the south remain prominent on the skyline even though they are 1.2Km away. An additional viewpoint is needed, therefore, within D1 but between 1-1.5Km away from the Project so that the effects can be clearly identified as significant or not.
327. D2 Little Horkesley and Wormingford: This Visual Receptor Area is located to the north and west of the Project, broadly between Little Horkesley and Wormingford and the northern part is located within Dedham Vale National Landscape (an AONB). Representative Viewpoints are identified as:
328. Viewpoint 4.04 PRoW off Crabtree Lane
329. Viewpoint 4.13 Wormingford
330. It is identified that construction activity and the finished Project would be visible in close views from the southern fringes of the Visual Receptor Area, and that within approximately 0.5 km, there would be close views of construction activity associated with the underground cable, overhead line and CSE compound, from the local road network, alongside local PRoW and scattered properties. Similar receptors between 0.5Km-1Km would be affected by close to medium distance views of this construction activity and by the operational Project. Between approximately 1 km and 2 km intermittent medium to long distance views of construction activity and the completed overhead line would be seen, including from the National Landscape and the Stour Valley Path. Viewpoint 4.04 PRoW off Crabtree Lane, is 0.9Km away so does not convey the significance of effects close to. An additional viewpoint is needed close to the CSE in order to assess and demonstrate the effects of introducing the compound permanently into the landscape and to demonstrate the effectiveness or not of any mitigation planting.
331. It is not accepted that significant effects would be limited to 1Km of the Project line due to the extended effects on receptors using linear features such as

PRoW and country lanes, the effects on settings of communities, as well as the negative effects on the perception of the wider countryside for both local householders and visitors.

332. We would suggest that effects on visual receptors would likely be significant (negative) between 1-2 km of the Project. however, additional viewpoint assessments and visualisations are needed to demonstrate this.
333. D3 Great Horkesley: This Visual Receptor Area is located to the south of the Project, broadly between the A12 near Ardleigh Reservoir and West Bergholt. The sole identified Representative viewpoint for this area is:
334. Viewpoint 4.03 Essex Way
335. It is identified that construction activity relating to both the overhead line, underground cable and two CSE compounds would be visible in close views from the northern fringes of the Visual Receptor Area. Within approximately 0.5 km, there would be close views of construction activity from PRoW such as Essex Way. This diminishes with distance.
336. Once operational, Viewpoint 4.03 Essex Way demonstrates how even at 600m the negative effect of the CSE is a major one. It is not acceptable that only one viewpoint and visualisation is available from this Receptor Area and further ones, such as those potential ones at VP 4.18 and VP 4.17 are required for an accurate understanding of negative effects alongside one or more from between 1-1.5Km where it is likely that there are still some significant effects. The negative effects of the pylons in this area are not demonstrable in this one visualisation.
337. We do not agree with the conclusion therefore that operational effects are likely only significant within 1Km of the Project line.
338. D4 North Colchester: This Visual Receptor Area is located to the south of the Project and south of the A12, broadly encompassing the northern urban edge of Colchester. There are no representative viewpoints within this Visual Receptor Area.
339. There would be no construction activity within the Visual Receptor Area.
340. We accept that effects on visual receptors would likely be negative but not significant during the construction phase and the operational phase but suggest a viewpoint is needed from e.g., the edge of the Receptor Area from National Cycle Network as it passes along Severall's Lane crossing over the A12 to demonstrate this. This is c 1Km from the Project line and it is known from elsewhere in the Project area that significant effects can be perceived at 1 Km.

341. D5 Fordham: This Visual Receptor Area is located to the north and west of the Project, broadly between Rochfords and Chappel, encompassing Fordham. The Representative Viewpoints are identified as:
342. Viewpoint 4.08 Fordham
343. Viewpoint 4.14 Fordham Road
344. It is identified that construction activity would be visible in close views from the south-eastern fringes of the Visual Receptor Area from the local road network (which is predominantly rural lanes), the PRoW network, NCN Route 13, and open access land, as well as scattered properties such as north-east of Fordham within the Colne Valley. The Project run of pylons is approximately 3Km through this area and would generate significant negative effects along this line as it crosses the valley between Fordham and the outskirts of West Bergholt parish. Viewpoint 4.14 Fordham Road identifies how significant this impact will be, introducing a major industrial element into an unspoilt, rural landscape. The pylon run would be substantially visible from most of the Fordham Hall Estate open access land with three of the pylons actually being sited on this land. The assertion that 'Views from within Fordham would be screened and filtered in places by woodland blocks (as represented by Figure 13.9.56: Wireline Visualisation from Viewpoint 4.08 Fordham in Volume II)' is at best misleading as the vegetation in the baseline photos and visualisations of Viewpoint 4.08 Fordham are uncut hedgerows not woodland except looking directly east on Figure No: 13.9.56b. Views from the south and east of Fordham, and as it crosses the Colne Valley would be from the applicant's Receptor Area D6 not D5.
345. It is identified at the operational stage there would be close to medium distance views of the Project from scattered properties such as those north-east of Fordham and from open access land, PRoW and local road networks, most of which are single track lanes between 0.5 -1 km and 1 -2Km, however there would be still be wide views of the Project along the valley where it runs along the elevated Plateau near Fordham. Therefore, we cannot agree that significant impacts would be limited to <1.5Km at the operational stage. More viewpoint assessments and preferably visualisations are needed from between 1.5-2Kms to demonstrate this assertion, including at least one viewpoint in the Colne Valley from Mill Road bridge looking west, as previously requested.
346. D6 Fordham Heath and Eight Ash Green: This Visual Receptor Area is located to the south and east of the Project, broadly between West Bergholt and the railway line north of Copford and Marks Tey. The sole identified Representative Viewpoints is:
347. Viewpoint 4.05 PRoW near Hillhouse Wood



348. The assessment identifies that, at both the construction and operational stage, the Project and its construction, would be visible in close views <0.5Km, including of the overhead line, from the local road network, such as A1124, (but also from the many lanes) alongside scattered properties such as southeast of Fordham, NCN Route 13, PRow (including the Essex Way) and from open access land within the Colne Valley and along the Essex Way where the overhead line would be visible on the skyline crossing the valley. From properties and people travelling along the B1508, in the north-east of the area, there would be open and elevated views along the valley, towards the Project as pylons would be stacked in views. There are still significant views between 0.5 km and 1 km, as evidenced by Viewpoint 4.05 PRow near Hillhouse Wood, sometimes filtered and screened in places by woodland blocks. VP4.05 is at 0.9Km from the Project line, therefore, we dispute that significant effects would not be found at greater distances than 1Km.
349. Further viewpoint assessments and visualisations are needed between at least 1-1.5Km to demonstrate this. Between approximately 1 km and 2 km, the overhead line would most often be seen on the skyline and above intervening trees in medium to long distance views. In addition, a viewpoint is need from the Essex Way as it runs through the Colne Valley, perhaps close to Cook's Hall, a Grade II\* building, to demonstrate the effects on this receptor. Potential viewpoints are also identified at 4.20 and 4.09, and one or both of these should be assessed. Another potential viewpoint is identified at VP4.21 which should also be assessed to demonstrate the effects on receptors to the southwest. It is accepted that visibility would decrease in the south-east of the Receptor Area and between approximately 2 km and 3 km. Our judgement is that significant effects could still arise between 1-1.5Km and additional viewpoint assessments and visualisations are needed to demonstrate whether this is so.
350. D7 Fordstreet and Aldham: This Visual Receptor Area is located to the north and west of the Project, broadly between Chappel, Fordstreet and Aldham. The sole Representative Viewpoints is identified as:
351. Viewpoint 4.11 Aldham
352. The Project would be visible in close views from the eastern fringes of the Visual Receptor Area. Within approximately 0.5 km, there would be close views of the overhead line from local road and PRow networks, including the A1124, (as represented by Figure 13.9.58: Wireline Visualisation from Viewpoint 4.11 Aldham in Volume II), open access land and the Essex Way south of Fordstreet as the Project crosses the Colne Valley. There would also be close views from settlements such as Aldham and Fordstreet, and scattered properties such as those north of Aldham. Between approximately 0.5 km and 1 km, there would be close to medium distance views of the

Project from local road and PRow networks, such as Essex Way, alongside the country house and golf course at Ashington Lodge, north-west of Aldham and scattered properties, although woodland cover would provide some filtering and screening in places. Between approximately 1 km and 2 km, the overhead line would be visible in medium to long views and would most often be seen on the skyline and above intervening trees, with visibility decreasing with distance as layers of vegetation and topography further screen out views. Effects on visual receptors would likely be significant (negative) within approximately 1 km of the Project. Beyond approximately 1 km, it is less likely that effects would be significant due to a reduction in perceptibility of the overhead line which would increase with distance.

353. D8 Great Tey: This Visual Receptor Area is located to the north of the Project, broadly between Swan Street and East Gores. The sole Representative Viewpoints is identified as:

354. Viewpoint 4.10 Great Tey

355. The Project would be visible in close views from the southern fringes of the Visual Receptor Area as it runs along the southern boundary of the area. Within approximately 0.5 km, there would be close views of the overhead line from the local road and PRow network, such as Essex Way, alongside scattered properties such as those south of Great Tey and properties at East Gores. Between approximately 0.5 km and 1 km, close to medium distance views of the Project would be visible from the local road and ProW network, alongside scattered properties such as those southwest of Great Tey. Between approximately 1 km and 2 km, the overhead line would most often be seen on the skyline in medium to long views and above intervening trees, with visibility decreasing with distance as layers of vegetation further screen out views and as much of Great Tey is in a slight dip, views towards the Project would be limited in places (as represented by Figure 13.9.57: Wireline Visualisation from Viewpoint 4.10 Great Tey in Volume II). Due to the fall in topography views from Swan Street would also be limited. Effects on visual receptors would likely be significant (negative) within approximately 1 km of the Project. Beyond approximately 1 km, it is less likely that effects would be significant due to a reduction in perceptibility of the overhead line which would increase with distance.

356. D9 Marks Tey: This Visual Receptor Area is located to the south of the Project, broadly between East Gores and Marks Tey. The sole Representative Viewpoints is identified as:

357. Viewpoint 4.12 Marks Tey

358. The Project would be visible in close views from the northern fringes of the Visual Receptor Area on its northern boundary. Within approximately 0.5 km,

there would be close views of the overhead line from the PRow and local road network including Salmon's Lane, Great Tey Road and the A120 alongside scattered properties such as those north-west of Marks Tey and near East Gores. Between approximately 0.5 km and 1 km the settlement of Little Tey would be exposed to close to medium distance views of the Project however views would be filtered and screened in places by vegetation surrounding the settlement. Between approximately 1 km and 2 km, (as represented by Figure 13.9.59: Wireline Visualisation from Viewpoint 4.12 Marks Tey in Volume II), medium to long distance views of the Project would be greatly reduced by layers of vegetation, however properties to the north of this town may be affected by distant views of the Project where the landscape opens and layers of vegetation are reduced. Marks Tey is largely inward facing and views would not be orientated towards the Project. However, there would be wide views of the overhead line from along the A120 and from properties along the road where the overhead line would be visible on the skyline across a wide view. Effects on visual receptors would likely be significant (negative) within approximately 1.5 km of the Project. Beyond approximately 1.5 km, it is less likely that effects would be significant due to a reduction in perceptibility of the overhead line which would increase with distance.

359. CCC have already requested a number of additional VPs as you know, and your consultant responded to those on 27/3/2023 prior to the Statutory consultation starting and prior to officers having seen the draft order limits. Having now seen the PEIR/photomontages/wireframes and draft order limits, CCC have the following comments relating to the additional requested VPs (with Dr Helen's wording from her email of the 27/3/2024 in italics):
360. *We note your comment in relation to a viewpoint south of Viewpoint 3.20 to illustrate the setting of Dedham. Having reviewed this location against the ZTV we note there is limited theoretical visibility of the Project. However, during recent fieldwork we identified a potential viewpoint location south of Viewpoint 3.20, at the scenic viewpoint near Gosnalls Farm (approx. NGR: 607196,233887), with elevated views south towards the Project. Please can you confirm if inclusion of this viewpoint in the ES would address your comment.*
361. CCC confirm that a VP at Gosnalls Farm should be included in the ES.
362. *A viewpoint on the PRow between 4.01 and 4.02(alt), east of Boxted (approx. NGR: 600860,230848 – to be microsited) will be considered for inclusion in the ES.*
363. *We note your comment about two additional viewpoints to the north of West Bergholt. It is considered that a single viewpoint could represent receptors in this location. Consideration will be given to including a viewpoint on the B1508*

*just south of the proposed CSEC location or at the junction between the B1508 and Crabtree Lane (approx. NGR: 595070,229990 – to be microsited) in the ES.*

364. CCC note the inclusion of the VP on the PRoW between 4.01 and 4.02alt. CCC confirm that a VP south of the CSEC should be included in the ES.
365. *We note your comment in relation to viewpoints north of Eight Ash Green and Fordham Heath. It is considered that a single viewpoint could represent receptors in this location. A viewpoint on the PRoW north of Heath Road (approx. NGR: 594268,226530 – to be microsited) will be considered for inclusion in the ES.*
366. *We note your comment in relation to a viewpoint on the Essex Way. A viewpoint on the Essex Way, west of Poole's Farm (approx. NGR: 594163,227485 – to be microsited) will be considered for inclusion in the ES.*
367. CCC consider both VP's should be included in the ES.
368. *We note your comment in relation to inclusion of a viewpoint south of Fordham. Due to difficulties safely taking photography from Mill Road south of Fordham, Viewpoint 4.0.8 alt (erroneously 4.27 on provided Viewpoint plan) will be included in the PEIR. Further consideration will be given to a viewpoint south of Fordham in the ES.*
369. *We note your comment in relation to inclusion of a viewpoint east of Great Tey. A viewpoint east of Great Tey (approx. NGR: 590634, 225703 – to be microsited) will be considered for inclusion in the ES.*
370. CCC considers a VP south of Fordham is essential in the ES and is unclear as to the safety implications noted. The new Great Tey VP is also welcomed and should be inserted into the ES.
371. *We note your comment in relation to viewpoints on the Essex Way west of Fordstreet and west of Teybrook Farm. Viewpoint 4.10 (Great Tey) will be included in the PEIR. Limited theoretical visibility is indicated from the Essex Way west of Fordstreet (approx. NGR 590815,227435) however this will be further investigated during fieldwork and if likely views towards the Project are available will be considered for inclusion in the ES. It is considered that existing Viewpoint 4.22 could be relocated to represent views from the Essex Way west of Teybrook Farm (approx. NGR: 588635,224480 – to be microsited), as it also represents views from the PRoW network but is more distant. Please can you confirm if inclusion of this viewpoint in the ES would address your comment.*

372. CCC still consider an additional VP from the Essex Way would be a more suitable approach and therefore request both VP are included in the ES.
373. *We note your comment in relation to including a viewpoint from Marks Tey Railway Station. Viewpoint 4.12 (Marks Tey) will be included in the PEIR and Viewpoint 4.21 (Brook Road) will also be considered for inclusion in the ES. These locations represent close to medium distance views of the Project. Further consideration will be given to the locations of viewpoints around Marks Tey for the ES.*
374. CCC still consider an additional VP from Marks Tey station is essential due to its heavily used and elevated nature so request that is included in the ES.

**375. Noise and Vibration**

376. The Council's in-house Environmental Protection team have assessed the PEIR and have provided the following comments:
377. The methodology contained within the PIER appears satisfactory.
378. There is no substation proposed within the Colchester district, but there are Cable Sealing End Compounds (CSEC's). The greatest potential for noise disturbance in Colchester is from the construction phase of the development. The majority of the works will take place at a significant distance from residential receptors and, as the development is linear, the impact on each group of receptors will be of limited duration.
379. We recommend that the following is covered in the Environmental Statement submitted as part of the formal application:
380. Construction noise/vibration
381. Any significant adverse impacts at noise sensitive receptors shall be identified, with predicted noise/vibration levels provided for each receptor (or group of receptors if relevant) once all mitigation is in place. This should be divided into local authority districts.
382. A Noise & Vibration Management Plan (NVMP) should be included covering all mitigation and control measures.
383. Details of community liaison should be included, with a dedicated telephone line for queries and complaints. All potentially affected residents should be written to with this information prior to commencement.
384. We recommend that site vehicles are fitted with white noise reversing alarms.
385. Hours of construction are not specified. These must be stated, and we require them to comply with our standard hours of 08:00-18:00 Monday to Friday, 08:00-13:00 Saturday, with no working Sunday or Public Holidays.
386. Note: We prefer not to receive S. 61 applications and to work with an agreed NVMP to allow for flexibility.

387. Operational noise/vibration
388. This does not appear to be a significant issue, however:
389. Potential line noise should be fully assessed and any adverse impacts at noise sensitive receptors identified, along with any mitigation.
390. We recommend a Compound Management Plan is included within the ES to minimise environmental impacts from noise, illumination etc.
391. The Council note that the scheme will be designed to comply with all current guidance regarding electric and magnetic fields and an EMF compliance report will be submitted with the ES.
392. This is important as whilst the majority of the alignment is remove from residential dwellings, in a number of CCC's communities it is very close.
393. Impact on Amenity
394. Whilst the scheme may meet the tests of acceptability from a technical noise and vibration point of view, it must also be considered from an impact on amenity/quality of life point of view.
395. The set down area and construction compound either side of the A134 in Great Horkelesley is close to residential receptors. It could easily be moved east of farm buildings to TL 98185 31054 where it would be away from residents and listed buildings - in particular a fine II\* at Chapel Cottage. This would reduce the levels of disturbance the local residents would experience, noting they are still likely to feel significant impact from being directly adjacent to the undergrounding construction swathe. Any options to reduce this impact should be taken.
396. As the alignment passes Aldham, the overhead alignment is only a matter of meters from residential gardens, the pylons are unacceptably close to residential properties. It is advised that residents will need to be convinced that the proposed scheme is safe and will not cause issues of noise and disturbance. Noting that there has already been a small tweak to the alignment in this position, moving the alignment still further away from the dwellings in Hines Close is strongly suggested.
397. This matter is dealt with in the Design Development Document at 5.4.150 where you state:
398. *A number of alternatives to divert the alignment to pass to the east and south of Aldhamhall Wood by extending the alignment on from TB053 to TB054 by around two or three spans were considered (see Figure 5.21). These included reconnecting at TB057 (approximately 300m longer with one additional pylon required and one more angle pylon) and further alternatives passing to the south of Aldham Hall (approximately 600 m longer with two additional pylons*

*required and two more angle pylons). Whilst noting that the alternatives all reduce proximity to a number of residential properties at the southeast corner of Aldham (noting most views are side views), effects are transferred to some degree to others further to the west and particularly to Chippetts Farm which is also a Grade II listed building. This would have open views of a nearby pylon and approaching alignment.*

399. The Council considers that there is a happy medium that removes the need to encroach on Chippetts Farm but pulls the alignment away from Aldham. In this instance the amendment from the 2023 alignment does not go far enough. Every meter of distance between the cul-de-sac of Hines Close, Church Close and the rest of the small village of Aldham (including its fine Church) and the alignment counts. For example, TB054 and TB55 could be shifted south east and with a small movement west of TB55 to avoid the woodland, there would be a number of meters of distance gained.

#### 400. **Socio-economics, Recreation and Tourism**

401. Karen Turnbull, the CCC's socio-economic lead has the following comments:

402. This consultation response focuses mainly on Chapter 15 Socio Economics, Recreation and Tourism, and considers potential effects on the following:

403. Employment and economic activity during construction

404. Businesses during construction and operation (and maintenance). This excludes potential effects on agricultural businesses, which are considered under Chapter 6: Agriculture and Soils

405. Severance and 'sterilisation' of land in the context of its potential for future development during construction and operation (and maintenance)

406. Disruption of access to community facilities during construction. This excludes visual amenity, which is considered under Chapter 13: Landscape and Visual

407. Disruption to tourism and recreational assets during construction and operation (and maintenance)

408. Pressures on local visitor accommodation during construction

409. The response also acknowledges that tourism and recreation also cut-across a wide variety of other chapters which have also been included here, as outlined in the consultation document and as such, the following should also be included:

410. 15.1.2 add in Chapter 11 Historic Environment

411. Going through the consultation document taking each point in turn, the comments and recommendations are:

412. 15.1.3 Volume II, Figure 15.2 Community Facilities, Businesses, Recreation and Tourism Assets – the consideration of these assets captures a wide variety of tourism and visitor experiences in visitor attractions (paid-for and non-paid for). However, importantly it does not include touring, (eg: coach tours, caravan touring and cycle touring), or event tourism. There is

consideration of recreational routes in 15.6.18, but these are formalised (such as walking the Essex Way). However, many visitors create their own itineraries and routes based on many factors which often include: meeting with friends and family, seeing places of particular interest, shopping, and views and these have not been included in Figure 15.3. It's this bespoke combination of visitor experiences and associated spend in small businesses which risks being lost here and yet contributes significantly to the visitor economy. Establishing the volume and value of such activities requires an additional piece of research.

413. 15.5 PIER Approach and Methods

414. 15.5.2 The Study Area – the Wider Study Area does not consider the ability to access other visitor attractions and experiences beyond those districts listed, and how the real visitor experience does not take into account Local Authority boundaries, people just go where they want to go and do what they want to do.

415. The approach needs to consider visitor attractions and experiences beyond the constraints outlined. The risk is that visitors will be impeded from taking a day trip from one end of the region to attractions, events in Colchester (and elsewhere) as they would be 'too hard to get to' and so 'won't bother'.

416. This has serious implications particularly for day-tripping to the region's premier visitor attractions and events such as Colchester Zoo, Colchester Castle, Firstsite, Colchester United FC, The Mercury Theatre and Colchester Arts Centre – attractions which regularly attract people from a 90 minute drive time.

417. Another risk here is that demand is driven to where it's easier to get to and so the balance of tourism and visitor revenues and experiences risks being distorted, not only during the construction phase but, possibly long into the future. If this is the case, then it would be harder to win back that visitor market. This is an area for further research and also consideration of the medium – long term mitigation investment which would be required.

418. This factor also affects staffing of visitor attractions, events and hospitality as it would be difficult for some members of staff to travel to their place of work. Please bear in mind that hospitality industry is a 24:7 set of services and so skills/staff retention and recruitment will be an issue for further assessment in the planning of this project and access to skills and staff recruitment is already an issue for the hospitality industry post-Pandemic and post-Brexit.

419. The point made in 15.1.3 above also applies here about touring and event tourism and individual itineraries.

420. The tourism and hospitality industry also relies on supply chains which reach throughout the region and beyond (certainly well beyond the Local Authorities listed), often with perishable products. Delays in supplying will affect the businesses concerned as well as the visitor experience. Supply chain impact



research is also recommended to understand the issues, potential solutions and mitigations required.

421. Colchester is one of the fastest growing places in the UK with a new build residential target of 920 new homes a year to 2033 (the life of the current Local Plan). Tourism is a significant contributor in influencing where people live as they often choose places based on a visit. There is also a risk that people actively seeking a new home will be negatively affected by their experience accessing the area (and indeed the wider East Anglia region). Moving house is a major driver of economic growth as people buy many goods and services to establish themselves in their new home. Research around the potential impact of this project on perceptions and image of the region, particularly where there are high targets for new residential development, is recommended.
422. 15.5.4 and 15.5.10 – it would be useful to know what the previous projects were where professional judgement and experience were part of the planning process.
423. 15.5.4 Study Areas. This project involves a four-year programme of construction. However, in restricting the consideration of the impacts to Local Study Areas and Wider Study Areas there appears to be no consideration of the more strategic factors affecting the tourism and visitor economy.
424. If visitors and regional residents are discouraged from travelling because getting around is fraught with construction congestion then visitor attractions and events will receive fewer visitors and consequently see reduced revenues.
425. Tourism, leisure and hospitality is already an industry affected greatly by the weather and is highly seasonal. It was also worst affected by the Pandemic and has been hit heavily by the UK's departure from Europe (access to staffing and food supply).
426. Recent research by Colchester City Council among its business community has found that recovery is slower than hoped largely due to the cost of living crisis which has impacted on secondary spend in leisure.
427. What this means for the 'tourism product' in Colchester and presumably across the region, is that profitability is negligible, therefore the ability to invest in improving quality of the experience and innovation in new experiences will be severely curtailed and so the region and its attractions become less competitive compared to other competitor visitor destinations and regions, such as Kent, Yorkshire, the West Country and other destinations.
428. This is particularly important when considering the combined impact of other major construction projects such as the Lower Thames Crossing and Sizewell C as well as other regeneration schemes such as Colchester's Town Deal and Levelling Up Programmes.
429. A less competitive region will likely see closures of tourism businesses and job losses as the ability to invest, and the willingness to borrow to invest, will be offset by the ability to make enough revenue to service the debt and make

a profit. Businesses are highly risk averse in these uncertain economic and political times. It is recommended that this strategic piece is considered in Chapter 17 Cumulative Effects and again, this dimension is collectively a priority for collective mitigations as the impacts of these projects could affect regional tourism for around 10 years collectively.

430. 15.5.5 Data Collection –
431. 15.5.6 the baseline is set at a high level and the data informing this is reliable and robust as it can be. However further data is needed.
432. 15.5.7 The additional data suggested here is limited in scope. There needs to be sectoral research not only of the tourism and hospitality industry as stated throughout this response, but also of the construction industry. The scope also needs to be widened. Brexit has had an impact on the availability of construction skills in the UK. With the high number of construction projects in the region demand for skills will rise, as will wages.
433. Currently, there is no consideration of this aspect and so no consideration of the potential gaps in the supply of construction skills across all trades combined with the inability to import labour. This is also a response to 15.8.4 and 15.8.5 and is important in revealing how competition for these skills will drive up the cost of construction projects, which in turn affect the ability to stay on budget and deliver the project on time, thus potentially impacting on leisure, tourism and recreation businesses for an even longer period.
434. This point also applies to 15.8.5 where there is consideration of the number of construction workers required but no consideration of how those workers might be acquired. There needs to be consideration of how the (combined) major construction projects could work with education and training to improve the supply of skills over the next decade. This would involve site visits, Challenge Competitions, work experience, internships, apprenticeships and job offers.
435. 15.6.21 and 15.8.13 also needs further insight. There are assumptions within these accommodation capacity figures which don't show the whole picture. The statement that: "...given that several tourism accommodation bedspaces are readily available in the wider study area, the overall sensitivity of the market is low", must be tested further.
436. Just because there is a bedspace there does not necessarily mean it is available. For instance:
437. a 4\* hotel would not necessarily be appropriate for construction teams – indeed, owners and operators of such establishments would likely actively block bookings from the construction sector in order to protect higher paying, guests, particularly for Weddings and events.
438. the cumulative impacts of the many construction projects in the region is already taking out accommodation stock and should be part of the considerations of Chapter 17. It is good to see this acknowledged in 15.8.15 where a more detailed market assessment of the accommodation market will take place but it does not mention the cumulative effects of other projects.

Indeed, only last month it was announced that Pontins at Pakefield nr Lowestoft will close in order to house 500 construction workers for Sizewell C. and so there is concern at the potential impacts of this project and others, particularly on the availability of budget accommodation in the Colchester city area.

439. Also much accommodation stock has been diverted from tourism to provide accommodation for refugees and asylum seekers. Though this is reducing accommodation stock is being refurbished which might affect availability. Colchester's Marks Tey Hotel is an example.
440. It is recommended that further research considers the impact of market segmentation on the actual availability of accommodation, not just based on bed/room numbers.
441. 15.7.9 Additional Mitigation – it is recommended that the scope of mitigation is widened and that the points raised above are also considered when applied to this table, particularly the definition of 'temporary'.
442. The impacts of what might be considered temporary for the duration of this project may well be long term when considering the nature of the tourism and hospitality industry and so further mitigations will need to be considered.
443. To summarise: there will be at least four seasons of impact on the hospitality and tourism industry and therefore the visitor economy, a cumulative risk of negative image and perception – and actual experience so easily shared on social media – of the region and its attractions (particularly anchor attractions for Colchester: Castle, Zoo, Firstsite, Mercury Theatre, Colchester United and the Arts Centre) and the industry's susceptibility to macro economic conditions, such as the value of the Pound, the weather, consumer confidence and the ability to spend and the degree of recovery of the industry and its ability to survive, make a profit and invest in the product. Also, applies to 18.3 Preliminary Residual Likely Significant Effects during Operation and Maintenance. And also, should therefore be considered in 17.3 Scoping Opinion.
444. Summary
445. The consultation document is set at baseline level. It is intended that this response offers support to address the gaps in data and other information, provides insights into further research required, challenges assumptions and also highlights where future mitigations may be required.
446. Airfield Matters

447. In the interests of the amenity of users of the Boxted Airfield, national defence and the general aviation industry in the area, the proposals should allow for their continued and safe use and if necessary, proposals be amended further – the undergrounding of the section from the EACN to the Great Horkesley CESC would help significantly in this regard along with the other associated matters.
448. Highways and Tourism/Employment Matters
449. Consideration should be given to the physical impact on the Public Right of Way network, and how that information is shared with the PROW team and users/user groups along with what mitigation/management is proposed. Consideration should be given to presenting closures and diverted route information online, as in many cases this will likely be a more user-friendly option than just providing PROW numbers or discovering notices on the day they choose to walk.
450. Preliminary workforce numbers are indicated at paragraph 15.8.4 as 800 Full Time Equivalent employees; however, no evidence is provided to support these figures. More details will be required at the DCO submission including the origin of these figures and the profile across the life of the project, including any assumptions around origins of workforce and how that informs the assessment of travel to site and the Travel Plan. These assumptions should feed into management and monitoring within the relevant management plans, including around shift patterns.
451. As there is limited data on the workforce numbers, any conclusions reached on impacts relating to vehicle movements should be treated with caution at this stage.
- 452. Traffic and Transport**
453. Generally, the Council will defer to the Highway Authority with regards to highway safety and efficiency matters. In this case that would be Essex County Council, apart from the impact on the trunk road network where it would be National Highways. The Council echoes ECC Highways Comment which it has seen as far as it relates to the CCC administrative boundary and all overarching matters.
454. From this response the Council would like to highlight the sections particularly relevant to the CCC area:
455. Section 16.2 reviews the transport matters set out in the National Policy Statements EN-1 and EN-5. Parts of the policies are provided; however, NPS-EN1 sets out that the Applicant will also need to consider:
456. How the development considers disruption to transport services and infrastructure (para 5.14.8).

457. How the development has encouraged modal shift of freight from road to other modes (para 5.14.12).
458. The Applicant should also consider Section 2.5 of NPS-5, which sets out the following:
459. *“When planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.5) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:*
460. *reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or*
461. *connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.”*
462. The applicant should set out any opportunities to connect people to the environment via improved transport connections that the development could deliver to mitigate its impacts on the transport, and particularly Public Rights of Way, network.
463. Paragraph 16.5.2 sets out the Study Area, clarity is sought as to whether the junctions connecting with the Strategic Road Network are included in the Study Area. It is considered that the junctions should be included, unless evidenced otherwise.
464. It is noted that the Applicant has decided not to provide a separate PRow chapter, with the impacts spread out over four chapters of the ES. The Council disagrees with this as an approach, as it makes reviewing the holistic impacts on PRow more difficult. This is particularly important given the likely significant impacts on the PRow network from the project.
465. As the assessment is based on the impacts on the Primary Access Routes, there is required to be commitments within the DCO, via the CTMP, which it is noted there currently are, that these are the routes utilised by construction traffic. However, there are no commitments on the number of vehicles using these routes, which brings risks to any conclusions on the extent of impacts.

Caps on HGV numbers should be presented in order to give confidence in the assessed results.

466. Paragraph 16.5.10 sets out the thresholds used for determining further assessment, no evidence is submitted that associates these impacts with calculated vehicle movements associated with project activities, which will be required as part of the DCO.
467. The assessment as set out at 16.5.14 is based on changes in daily traffic flows; consideration is needed towards assessing the hour of greatest change, which is considered to be a requirement based on the following text, which is taken from paragraph 1.22 of the IEMA guidance '*Environmental Assessment of Road Traffic and Movement*':
468. *“Traffic and movement assessments for EIA and non-statutory environmental assessments, present the impact of traffic and movement on people and the environment – which are initially undertaken with reference to daily traffic flows prior to assessing the time period with the highest potential impact (i.e. degree of change from baseline conditions), which may not be the same as the time period with the highest baseline traffic flows”.*
469. The large proportion of traffic impact is likely to be in a short specific time frame (as a result of shift patterns), and only assessing the 12-hour impact dilutes this impact against a greater baseline of traffic.
470. The assessment as set out at 16.5.14 identifies 12-hour shift patterns; further clarity is sought on how these shift patterns will be monitored. It is recommended that through the CTMP a monitor and manage process is embedded to check the shift patterns are commensurate with those assessed, and, if not, to either assess to see if the impacts are material or to identify additional management measures that can be put in place to address these impacts.
471. As per paragraph 16.5.16, it would be beneficial to all parties for the ES to give a clear understanding of the temporal nature of the impacts at all relevant locations; potentially setting out a profile for the project, as this will make clear what impacts are short term.

472. It is noted that the traffic at the crossing points is not included in the PEIR as per 16.6.7. Assuming that this is only at the crossing point, and not where it has travelled to access the site; this is considered reasonable; however, consideration should be given to the impact on delay on the highway network as a result of the use of these crossing points as per EN-1.
473. The growth factor referred to at paragraph 16.6.9 should be set out, including how it has been calculated. Further details should be provided on the calculation method for obtaining 12-hour flows as per paragraph 16.6.10, as there would be some concern over the application of generic figures from the SRN on rural roads, albeit this may have limited impact on any conclusions.
474. The Council welcome the commitments at paragraph 16.7.7; however, further details are needed, and more detailed comments are provided on the DRAFT Construction Traffic Management Plan below.
475. The conclusions at paragraph 16.7.12 that no further mitigation beyond the embedded mitigation is needed is not agreed; however, it is recognised that this is a work in progress. Limited evidence is provided on the change in traffic flows and how the traffic flows associated with the project have been generated for each access, nor why identified impacts at Appendix 16.3 do not require mitigation. There are limited commitments to managing traffic which creates risk in the assessment methodology, which include the following:
476. No evidence supporting the number of workers or the modal split of workers. Nor any controls within the CTMP.
477. No evidence indicating the origin of the workforce. Nor any controls within the CTMP.
478. No evidence indicating the shift patterns of the workforce. Nor any controls within the CTMP.
479. No evidence supporting the number or timing of HGV movements. Nor any controls within the CTMP.
480. No assessment of the hour of greatest change is provided.
481. Appendix 16.3 indicates a number of locations where an impact would occur as a result of daily increases in HGV traffic at Sensitive Locations; and no rationale is provided as to why this would not result in a requirement for mitigation. It is recognised that in some cases this may be down to the low baseline of movements or the temporal nature of the project, but this is not explained.

482. Further assessment is indicated at paragraph 16.8.11 as part of the ES, and this is welcomed, as it is currently difficult to ascertain how conclusions have been reached.
483. The approach of reporting the highest impacts at each access as per paragraph 16.9.3 is considered to be appropriate for the ES, but for understanding the magnitude of impact it is beneficial to understand the temporal nature of the traffic on each link.
484. Appendix 16.1 Part 16.3 Traffic Flows
485. Appendix 16.1 includes a description of the highway links and at 16.1.2 a list of the haul road crossing points. For each crossing point the Council requires the following information to be submitted at DCO:
486. Visibility splays within the DCO redline or public highway based on the road speed limit or surveyed speed data.
487. Vehicle swept paths.
488. Traffic Management.
489. Data on the relative use of the access (i.e. total vehicle movements, peak vehicle movements broke down by vehicle class).

Road ID	Location	Highway Constraints Identified by Applicant at Table A 16.1.3	% Increase in HGVs	% Increase in Total Vehicles
Link PAR28 – Wick Road / Grove Hill	Langham	<i>“Grove Hill unsuitable for HGVs”</i>	132%	8%
Link PAR32 – Old Ipswich Road	Junction 29 Colchester	<i>“Weight limit 7.5 Tonnes from the Old Ipswich Road underpass to the site access point to</i>	91%	12%



		<i>pylons TB9 – TB20”</i>		
Link PAR35 - A1341 Via Urbis Romanae	North Colchester	None identified by Applicant	42%	2%
Link PAR36 – A134 Northern Approach Road / A134 Wildev Avenue / A134 Nayland Road / A134 The Causeway	Horkesley Heath	None identified by Applicant	69%	4%
Link PAR37 – A1124 Halstead Road	Eight Ash Green	None identified by Applicant	42%	2%
Link PAR38 – Mill Road	South of Fordham	None identified by Applicant	66%	10%

490. A Stage 1 Road Safety Audit with designer’s response.  
491. Road construction.

492. Appendix 16.3 Preliminary Construction Effects

493. As above, a number of sensitive locations are identified experiencing effects; further discussions are sought on these effects, and either the mitigation strategy or the rationale for why mitigation is not required for these locations. These include the following:

494. PEIR Cumulative Effects Chapter

495. Limited detail is provided on the assessment of cumulative effects; however, with regards to transport, the proposed high-level methodology appears

reasonable. However, transport specific interactions the Council would recommend the Applicant considers include the following:

496. The interrelationship between impacts on users of PRoW and users of the highway network.
497. The interrelationship of impacts on PRoW users (i.e. visual, transport, health and recreation etc).
498. Repeated impacts on users of the transport network over the lifetime of the project (i.e. repeated closures and traffic management) for both PRoW and the road network.
499. Further to the above, consideration needs to be given to the impact of this project in combination of other projects in terms of repeated impacts on receptors as a result of multiple projects occurring one after the other over a relatively short timeframe.
500. There is limited evidence that has been provided that supports the conclusions on the likely preliminary cumulative effects at Table 17.2. As such, any conclusions relating to transport are not agreed.
501. PEIR Volume 3 Appendix 4.1 includes a DRAFT COCP
502. Paragraph 5.1.4 refers to a Staff Travel Plan, it would be beneficial for a Draft of this document to be submitted prior to the DCO, so that issues can be identified at an early stage and reduce potential disagreement during the examination.
503. Specific Comments on the Mitigation Measures, relating to transport, as set out at Table 5.1 are as follows:

Ref	Comments
GG09	Details are needed on the approval process for the CTMP. It is currently considered that at Outline CTMP should be submitted as part of the DCO, with the final CTMP being discharged post consent, once a contractor is confirmed and final details are known, by the highway authority.
GG10	Further details are required on the Staff Travel Plan, including management processes, controls, targets, reporting and the approval process.

GG28	Wheel washing is required at any access where there is significant vehicle movement to prevent detritus being brought onto the highway and in the interests of road safety.
GG36	Complaints relating to traffic and transport should be reviewed as part of the CTMP.
T05	<i>The contractor must have measures in place to prevent deposits onto the public highway, with the ability to rectify any issues as soon as reasonably possible, if conditions on the public highway worsen.</i>
T10	As above, further details are needed on the proposed travel plan, including appropriate approval processes.

504. Annex B includes a Public Rights of Way Management Strategy
505. The legal minimum widths are quoted (as per Highway Act 1980) at paragraph 5.1.7. For bridleways, three metres is the maximum width of a bridleway and is the width we aspire to provide on all our network within Essex and user groups will expect the same. This is especially preferable if the bridleway or diverted route is temporarily enclosed by fencing or segregated to accommodate a temporary access road.
506. No specific timescales are mentioned within the Management Measures section. This should be agreed with the PROW maintenance team – months would be preferable to weeks or days’ notice.
507. It would be helpful to have the proposal for each PROW affected ahead of time and in a format that provides the following information (this a similar format to that presented in the **Appendix A Routes with Public Access Affected by the Project** towards the end of this document – however Parish and district names (rather than parish numbers) would be preferable as it is much clearer to read and therefore assess.
508. Within **Appendix A Routes with Public Access Affected by the Project** it mentions the type of closure proposed. *“Closed without a diversion – diversion is not required as PROW users can navigate around works site”* requires further explanation. This gives the impression that a diverted route is not provided – how will that be achieved in practice. It would be helpful if all types of closure proposed are given a subsection to provide more detail of what is proposed with consultation with the PROW maintenance team to ensure the measures provided are considered acceptable.

509. With reference to paragraph 5.4.2, remediation should always be discussed with the relevant PROW Officer. The landowner is unlikely to know the appropriate and legal considerations for all types of PROW and they may agree to something the local Highway Authority does not consider acceptable. Pre and post condition surveys should be submitted to the relevant PROW Officer for consideration.
510. Construction Access Plans and Consultation Plans
511. Further discussions on the potential mitigation locations on the Construction Access Plans is welcomed. The Highway Authority will need to be confident that mitigation is deliverable either within the site or the public highway.
512. With regards to Primary Access Route for H18-A1 and H19-A1, there have been a number of planning applications on Ipswich Road in neighbouring TDC that area recently that may need to be considered (Application Reference: 23/00136 and 24/00119). For Wick Lane, further information is sought on whether any management processes may be put in place given the unsuitable nature of the location for high HGV traffic volumes.
513. Any permissions sought under the DCO will need to ensure that any street furniture that is required to be temporarily removed (such as for D1 to D6) is reinstated to the satisfaction of the highway authority. The applicant will need to ensure that necessary powers are sought under the DCO to implement any temporary restrictions on the highway (such as those shown at C12).
514. It is recommended that any proposals that require alterations to the highway network (such as C14 and C15) are discussed with the highway authority at an early stage.
515. Vehicle swept paths should be provided for locations where highway mitigation is being proposed.
516. For those locations where temporary signage is to be used either as a result of limited forward visibility or highway width, consideration needs to be given as to whether the proposed signage would be effective in ensuring compliance, or whether additional mitigation is needed.
517. The Draft Outline Construction Traffic Management Plan
518. Confirmation is sought on what elements of the works the CTMP will apply to, particularly what scale of pre commencement works might occur without the controls embedded within the CTMP being applicable. It is considered sensible for the CTMP to be applicable to all works.
519. As noted, it would be beneficial for an indicative construction schedule to be provided as part of the DCO submission; this will give an indication of the temporal nature of some of the project impacts, and so will help inform discussions.

520. The working hours set out at paragraph 2.3.1 are assumed hours and as such bring risks to any assessment methodologies as they move impacts outside of the normal peak hours. They also are likely to mean a greater impact in the hour of greatest change due to lower baselines in traffic. It is recommended that a review process is embedded into the CTMP, such that the staff arrival and departures patterns are monitored and if more *typical* shift patterns are exhibited, a review of the development impacts is undertaken and in the event of any additional impacts being identified, reasonable and pragmatic management measures are implemented to reduce these impacts.
521. The programme of working hours set out in Section 2.3 is far beyond what would ordinarily be accepted as reasonable working hours. Working hours should exclude working after 1pm on Saturday and no working on Sunday and Bank Holidays, to allow much needed respite for residents at these more sensitive times.
522. The Councils welcome the commitment to preconstruction surveys at Section 5.2. The approval process for the surveys needs to be agreed, through the CTMP or otherwise. Consideration is needed around a process that allows for the highway authorities to recover costs for any extraneous damage to the highway network as a result of the development.
523. An assessment of AIL and HGV routes to/from the site should be undertaken, inclusive of a review of structures to ensure that they can accommodate the required vehicles, to understand any mitigation that may be required, and how it links to the Construction Access Plans.
524. Whilst decommissioning sits outside of the scope of the CTMP, it is considered reasonable that there is a requirement for a decommissioning plan to be submitted for approval of the authorities prior to any decommissioning activity and reflecting up to date standards and practices.
525. With regards to paragraph 5.4.9, how will it be determined what vehicle movements are time critical? Whilst the need for flexibility is recognised, any movements outside of the core working hours should be minimal, and only in extraneous situations. This needs to be monitored and reported on, with any excessive use resulting in a review. There are no proposals to limit the number of HGV movements to reflect those predicted by the Applicant, and this is not considered to be acceptable.
526. Given the shift patterns proposed, it is not understood why any staff vehicles would arrive during the traditional peak hours, as above a review mechanism should be embedded into the CTMP, such that the staff arrival and departures patterns are monitored and if more *typical* shift patterns are exhibited, a review of the development impacts is undertaken and in the event of any additional impacts being identified, reasonable and pragmatic management measures are implemented to reduced these impacts. Any assessment of peak hour impacts within the Transport Assessment should consider the potential for movements within these hours.

527. The outputs from the booking system should be reported to the local authorities so that compliance with assessed HGV numbers can be evidenced, and to inform future developments.
528. The frequency of use of the contingency routes needs to be considered. Further information is also sought on the location, purpose and use of the Alternative Access Routes referred to in the consultation materials.
529. With reference to paragraph 5.6.4, any proposals for temporary accesses that are not needed for operation to be made permanent as a legacy benefit, need to be treated on a case-by-case basis with discussions with the highway authority. Any design may need to be altered in order to be commensurate with their future use rather than the temporary use during construction.
530. The management measures within Section 6 do not require the developer to achieve any levels of sustainable travel and do not include any material commitments. EN-1 sets out the need for achieving sustainable transport patterns. Measures should be put in place that ensure high levels of car share or other non-car modes reflecting any assumptions within the ES and Transport Assessment. This should be monitored, reported and managed to respond to low levels of car share.
531. The monitoring of vehicle movements through the CTMP needs to be reported to the local highway authorities, so that any incidence of failed compliance is understood and can be investigated, along with monitoring of staff arrival and departure patterns and modal splits. There is significant concern about construction vehicles failing to utilise the construction routes, and so robust monitoring processes are needed to give confidence.
532. All HGVs accessing the site should include some form of identification within the cabin so that project vehicles are identifiable to the public.
533. It is recommended that an Outline Access Management Plan is submitted as part of the DCO, the plan should look to:
534. Set out the requirements and standards that will be incorporated into the final access design.
535. The approach to accessing the site, including access and haul road crossing locations.
536. Explanation of the rationale for the design of the accesses / crossing points.
537. Drawings of the accesses/crossing points, including extent of red line, highway boundary, swept paths and visibility splays.
538. A Road Safety Audit with designers' response.
539. Mitigation measures.
540. The process for technical approval.
541. Traffic management.
542. Access management.
543. Processes for protecting the highway from detritus.
544. The Council will defer to ECC Highways with regards to haul road and bellmouth size form and geometry.

545. It is noted that the DCO will need a mechanism for recovering costs as a result of extraneous traffic on the local highway network associated with construction of the development.
546. NGET must consider the potential for significant adverse environmental impacts, including cumulative impacts, the Traffic and Transport proposals should include a statement around requiring more extensive monitoring, controls and enforcement for construction traffic, as it is almost absent from the documents, as well as further information on the assessment method.
547. The transport impacts of the pre-commencement operations including the creation of temporary site accesses and construction compounds also need to be addressed.
548. Accesses and haul routes should minimise impacts on ecological and landscape features and minimise impacts on the efficient and effective operation of agricultural land and businesses but there is limited detail on this in the PEIR. The ES will need to be more thorough and NGET must be mindful that this is a key issue for local residents.
549. The scheme crosses the A12 T and the A120T roads. Both of these are key regional distributors and are vital for the day to day lives of many of Colchester residents. The A12 has recently been granted a DCO for widening from two lanes to three lanes between Chelmsford and Colchester throughout, where it is not already three lanes on either carriageway.
550. This is a major project and will inevitably cause significant levels of disruption. Liaison with National Highways (who are the developers for the A12 widening DCO) is strongly suggested to ensure that the relevant constructions phases do not clash as the cumulative impact of an uncoordinated approach is hard to the highway network that very significant.
551. A120 - The use of the A120 for construction traffic is a significant issue and will also suffer know on effects of the A12 works noted above – this needs to be carefully assessed.
552. A134 - Very significant increase in traffic through the village; the A134 is already busy; the village does not have pedestrian footpaths on both sides of the road and the side of the road alternates; it is already very difficult to safely cross; this will be a significant blight on the village.
553. The haul roads are very close indeed to local residences who will be severely impacted by all this traffic.

554. This will inevitably lead to an increase in rat-running traffic along local rural lanes which already suffer from such eg Boxted Road, London Road, Coach Road.
555. The Council are particularly concerned about a number of construction access points and the inevitable wear and tear on the A and B road network from the numerous HGV movements needs not only to bring in the cables on drums, the steel for the towers and concrete for the foundations but also to lay the extensive haul road network and access points. A full road conditions survey should be included within any draft Traffic EMP and NGET must commit to repair any sections of A and B Road that suffer damage following the construction phase – as noted above the DCO should include a mechanism to secure this.
556. Public Rights of Way
557. The alignment in the relevant CCC area of Section C and all of Section D crosses numerous Public Rights of Way (PRoW) and at every crossing point there is a clear potential for significant disruption to their use. PRoW's are vital for access to the countryside, for wellbeing and within national planning policy, **the Council is disappointed that Public Rights of Way are not treated as a separate topic in their own right**, but split up over a number of disciplines that makes it difficult to see the full picture. Effective mitigation is needed for the impacts on recreational users of the PRoW network, especially during the construction period.
558. The removal of vegetation at the distances stated and the installation of pylons is likely to have a major negative impact on enjoyment of Public Rights of Way. Where possible the reinstatement of vegetation is preferable to 'soften' the landscape, which is stated as such within this chapter. Reinstatement is detailed within the PROW Management Plan.
559. Given the negative visual impact aspect the Council would expect to receive improvements to the PROW network, rather than accepting the minimum pre-construction condition. This may not be applicable to all sections of PROW affected but, in those circumstances, where a change in surface condition, drainage improvement or the permanent removal of an unlawful structure could resolve a long-term issue, it is reasonable for that to be provided as per EN-5.
560. **Cumulative Effects**
561. The Council are concerned that the PEIR does not adequately address the cumulative impacts on the scheme in the East Anglian region, noting the



numerous energy and transport projects already consented and likely forthcoming. The ES will need to be significantly bolstered in that regard.

## 562. **Mitigation**

563. The Council considers that, notwithstanding embedded mitigation and potential modifications to the scheme as requested above, it will be unavoidable for the development to result in residual impacts on the community and locality, including on amenity, loss/reduced quality of recreational opportunity for the community, culture and heritage, and health and wellbeing. The Council expects appropriate and robust mitigation and/or compensatory offsetting for such residual impacts, which could be, for example, include funding for alternative outdoor recreational offers, access and amenity improvements, cultural and heritage enhancements.
564. Secondary mitigation would be in addition to any potential community benefits from the development, including any emerging requirements in the anticipated community benefit guidance as outlined in the recent consultation focussed on community benefits for Electricity Transmission Network Infrastructure which is expected and hoped for in the coming weeks.
565. CCC would encourage the project promoter to also consider such community benefit options. The Council would be happy to discuss further options suitable for the locality. The Council also seeks project promoters to consider legacy opportunities of all elements of their development.
566. Social Value
567. The impacts of climate change and efforts to mitigate it are unevenly distributed. A just transition aims to maximize the benefits of climate action and minimize negative impacts on those most affected. This transition to renewable energy should be fair, inclusive, and create positive opportunities for all. CCC, as a host authority, will be experiencing all the negative impacts without receiving any benefits. The cumulative impacts of these are not being addressed by any agency or stakeholder, increases in HGV traffic throughout the construction phase and the lifetime of the projects, the combined effects of visual blight, environmental blight all point to detrimental impacts across our communities, environment and economies.
568. In terms of delivering social value, we expect to see legacy funding for the lifetime of the project this includes funding commitments to fill the gaps in our green energy skills it starts with education and moves up onto training and employment. We look forward to engaging with National Grid in how they can support our communities by using local providers wherever possible (see below) and supporting our ambition that allows our workforce to become highly skilled across the renewables sector.
569. CCC expect to see community benefits that genuinely impact the lives of those who will be blighted by these proposals should they be accepted. In line

with our adopted policies to promote active travel and improve people's health and social outcomes we expect to see significant investment in our strategic cycle infrastructure particularly along the coast enabling both commutable and leisure routes. This will support our residents in accessing existing infrastructure by being able to make active travel choices they will also support our leisure and tourism strategic aims.

570. Employment Opportunities

571. The Council consider that there are significant employment opportunities that the project alone will bring to the county and the wider North Essex region, and where there is synergy alongside further transmission, distribution and generation projects. We expect National Grid to coordinate their projects in Essex and actively engage with the Council, with regard to Norwich to Tilbury, to secure benefits for and investment in local businesses and employment networks. Critical national infrastructure must not only deliver the Government's energy objectives but also deliver sustainable societal and economic impacts in the regions that are hosting them. NGET as a responsible corporate entity should actively engage with the Council and its partners to identify and deliver inclusive growth, social value and additional wider benefits.

572. Skills

573. In terms of skills the Council is seeking for NGET to foster the local skills base in energy related industries within an area which is destined to host numerous energy related infrastructure projects. Therefore, financial measures in respect of relevant skills training within the local area should be agreed. There must also be adequate assessment of the likely origins of the labour force (both local and non-local), especially in the context of other energy projects with potentially overlapping construction periods, for example with the A12 three lane project.

**ENDS**