

AENC-NG-CNS-REP-0128

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.7 Draft Statement of Common Ground - Tendring
District Council - Tracked Changes Version

Final Issue B

February 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(g)

nationalgrid

Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
<u>A</u>	<u>29 August 2025</u>	<u>DCO Application</u>
<u>B</u>	<u>26 February 2026</u>	<u>Deadline 1</u>

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Contents

1.	Introduction	1
1.1	Overview	1
1.2	Project Description	2
1.3	Format and structure of this document	3
2.	Record of Key Engagement	4
2.1	Introduction	4
2.2	Summary of Key Engagement	4
3.	Matters Agreed, Not Agreed or Under Discussion	14
3.1	Overview	14
3.2	Project Development, Description and Design	15
3.3	Ecology and Biodiversity	24
3.4	Green Infrastructure	40
3.5	Air Quality	45
3.6	Noise and Vibration	52
3.7	Health and Wellbeing	67
3.8	Historic Environment	82
3.9	Landscape and Visual	94
3.10	Socio-economics, Recreation and Tourism	109
3.11	Cumulative Effects	122
3.12	Development Consent Order	134
3.13	Other Matters	135
4.	Confirmation of Agreement	136

Table 2.1	Summary of Key Engagement between National Grid and Tendring District Council	4
Table 3.1	Agreement Status for Matters Presented in Section 3	14
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters	15
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	24
Table 3.5	Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality	45
Table 3.6	Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration	52
Table 3.7	Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing	67
Table 3.8	Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment	82
Table 3.9	Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual	94

Table 3.10	Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism	109
Table 3.11	Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects	122
Table 3.12	Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order	134

Abbreviations	137
---------------	-----

1.	Introduction	1
1.1	Overview	1
1.2	Project Description	2
1.3	Format and structure of this document	3
2.	Record of Key Engagement	4
2.1	Introduction	4
2.2	Summary of Key Engagement	4
3.	Matters Agreed, Not Agreed or Under Discussion	12
3.1	Overview	12
3.2	Project Development, Description and Design	13
3.3	Ecology and Biodiversity	18
3.4	Air Quality	23
3.5	Noise and Vibration	26
3.6	Health and Wellbeing	29
3.7	Historic Environment	32
3.8	Landscape and Visual	38
3.9	Socio-economics, Recreation and Tourism	47
3.10	Cumulative Effects	51
3.11	Development Consent Order	54
3.12	Other Matters	54
4.	Confirmation of Agreement	55

Table 2.1	Summary of Key Engagement between National Grid and Tendring District Council	4
Table 3.1	Agreement Status for Matters Presented in Section 3	12
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters	13
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	18
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality	23

Table 3.5	Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration	26
Table 3.6	Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing	29
Table 3.7	Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment	32
Table 3.8	Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual	38
Table 3.9	Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism	47
Table 3.10	Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects	51
Table 3.11	Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order	54

Abbreviations		56
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1. Introduction

1.1 Overview

- 1.1.1 This draft Statement of Common Ground (SoCG) has been prepared relating to the application for development consent for the proposed Norwich to Tilbury project (the 'Project') made by National Grid Electricity Transmission plc (referred to as 'National Grid' within this document). It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.2 This SoCG has been prepared by National Grid as the Applicant and Tendring District Council (TDC). Tendring District Council is a prescribed consultee under Section 43 of the Planning Act 2008 (PA 2008) as a Host Authority.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents. All documents are available in the deposit locations and /or the Planning Inspectorate website.
- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties. It identifies areas of the Project within the Development Consent Order (DCO) application ('the Application'), where matters are agreed, under discussion or not agreed between the parties.
- 1.1.5 The engagement between the parties across the breadth of matters is ongoing. The SoCG is an evolving document and detailed wording within it is still being discussed between the parties.
- 1.1.6 This draft SoCG has been prepared at an early stage phase of the DCO examination process, for Deadline 1 ahead of submission. It is intended to be a live and working document which will be updated as the Project progresses and shared with TDC Tendring District Council at key points for discussion.
- 1.1.7 Future iterations will evolve from this point and all parties reserve the right to supplement the matters identified as we progress the discussions to ensure it is comprehensive. There are many items within it that although not currently agreed have the potential to be resolved. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.
- 1.1.8 The parties will continue to work together, seeking resolution where appropriate to ensure this SoCG is a reliable and up to date document which can inform the examination.
- 1.1.9 This SoCG has been structured to reflect topics of the Application which are relevant to TDC. The applicable matters considered within this SoCG apply to TDC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):
- Project development, description and design
 - Ecology and Biodiversity

- Air Quality
- Noise and Vibration
- Health and Wellbeing
- Historic Environment
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Cumulative Effects
- Development Consent Order
- Other Matters

Tendring District Council will have regard to any points raised by statutory bodies and other relevant Interested Parties in respect of the matters covered in the SoCG. Therefore, this version reflects the current position of Tendring District Council but may be subject to change during the examination. A final position will be recorded in the final SoCG to be submitted close to the examination.

1.2 Project Description

1.2.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1))
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation

- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
 - Ancillary and/or temporary works associated with the construction of the Project.
- 1.2.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).
- 1.2.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.
- 1.2.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.3 Format and structure of this document

- 1.3.1 This SoCG is structured as follows:
- **Section 2** provides a summary of the key engagement undertaken to date with TDC
 - **Section 3** summarises the key matters and captures the status of each issue / matter
 - **Section 4** includes the sign off sheet

2. Record of Key Engagement

2.1 Introduction

2.1.1 National Grid has engaged with TDC on the Project throughout the pre-application process. This has included:

- Non-statutory consultation in Spring 2022 and Summer 2023
- Statutory consultation in Spring 2024
- Targeted consultations in Spring 2025
- Regular meetings with lead officers about the Project as a whole
- Regular ‘Thematic Group’ meetings bringing together host authorities to discuss specific topics
- One to one / small group technical meetings on specific detailed matters
- Sharing of papers and draft documentation at key stages

2.1.2 Further details on National Grid’s engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and TDC.

2.2.2 It is agreed that the below is an accurate record of the key meetings and consultation undertaken between National Grid and Tendring District Council in relation to the issues addressed in this SoCG.

Table 2.1 Summary of Key Engagement between National Grid and Tendring District Council

Date	Format	Topic/Description
General		
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.

Date	Format	Topic/Description
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
October 2023 – Ongoing	Meeting	Monthly informal catch-up meetings.
November 2023	Meeting	All host authority workshop.
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
May 2024	Meeting	East Anglia Connection Node (EACN) discussion.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid shared the 2 nd iteration draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	National Grid issued the 2 nd iteration draft versions of the Outline CoCP and Outline LEMP to all host authorities for comment.

Date	Format	Topic/Description
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on the 2 nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop
March 2025	Meeting	Meeting to discuss National Grid's approach to routeing and siting
May 2025	Meeting	All host authority workshop
<u>May 2025</u>	<u>Technical Note</u>	<u>National Grid shared the long list of other developments</u>
June 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
<u>June 2025</u>	<u>Email Correspondence</u>	<u>National Grid issued draft DCO, explanatory memorandum and draft requirements</u>
<u>July 2025</u>	<u>Meeting</u>	<u>All host authority workshop</u>
<u>August 2025</u>	<u>Email Correspondence</u>	<u>National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision</u>
<u>August 2025</u>	<u>Meeting</u>	<u>Meeting to provide project and design update</u>
<u>September 2025</u>	<u>Meeting</u>	<u>All host authority workshop</u>
<u>October 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the Traffic, Transport and PRow section of the Environmental Statement.</u>
<u>November 2025</u>	<u>Meeting</u>	<u>All host authority workshop</u>
<u>January 2026</u>	<u>Meeting</u>	<u>All host authority workshop</u>
Ecology and Biodiversity		
July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from stakeholders.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.

Date	Format	Topic/Description
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Email Correspondence	National Grid issued the Protected Species Proposed Mitigation Measures to stakeholders including TDC.
January 2025	Email Correspondence	National Grid issued the BNG Strategy to stakeholders including TDC.
January 2025	Email Correspondence	National Grid shared the 2 nd iteration of the Outline LEMP
<u>May 2025</u>	<u>Email Correspondence</u>	<u>National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (OLEMP) – Appendix D, Outline Landscape Proposals</u>
May 2025	Meeting	National Grid hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
<u>September 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement</u>
Air Quality		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
Noise and vibration		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
July 2023	Technical Note	National Grid issued a technical note to agree the approach to undertaking operational noise impact assessment of the proposed EACN Substation.
Health and Wellbeing		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.

Date	Format	Topic/Description
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment, including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
<u>September 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement</u>

Historic Environment

July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.

Date	Format	Topic/Description
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
June 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Meeting	Historic Environment Thematic Group Meeting – aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Meeting	National Grid shared the setting survey locations with stakeholders.
December 2024	Meeting	Archaeology Working Group Meeting.
<u>January 2025</u>	<u>Meeting</u>	<u>Archaeology Working Group Meeting.</u>
<u>February 2025</u>	<u>Meeting</u>	<u>Archaeology Working Group Meeting.</u>
February 2025	Email Correspondence	National Grid shared the Heritage Viewpoints Documents with stakeholders.
February 2025	Email Correspondence	National Grid shared the Draft Heritage Baseline Report with stakeholders.
February 2025	Meeting	Thematic group meeting to further discussions regarding the Historic Environment Viewpoints.
February 2025	Meeting	Meeting to discuss the Draft Heritage Baseline Report.
March 2025	Email Correspondence	National Grid issued updated the Historic Environment Viewpoints information to stakeholders including TDC.

Date	Format	Topic/Description
April 2025	Email Correspondence	National Grid issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
April 2025	Meeting	Archaeology Working Group Meeting.
May 2025	Meeting	Archaeology Working Group Meeting.
June 2025	Meeting	Archaeology Working Group Meeting.
June 2025	Email Correspondence	National Grid shared trench plans for Site 009, Area 34
June 2025	Email Correspondence	National Grid shared updated trench plans for Site 009, Area 34
June 2025	Email Correspondence	National Grid share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting.
August 2025	Meeting	Archaeology Working Group Meeting.
September 2025	Meeting	Archaeology Working Group Meeting.
October 2025	Meeting	Archaeology Working Group Meeting.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex North)
October 2025	Email	National Grid shared the Trial Trench Plans for review and approval for site 009
November 2025	Meeting	Archaeology Working Group Meeting.
November 2025	Email	National Grid shapefile for the phase 2 survey along with the priority area survey
December 2025	Meeting	Archaeology Working Group Meeting.
December 2025	Email	National Grid shared the WSI for the Phase 2 geophysical survey
January 2026	Meeting	Archaeology Working Group Meeting.
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss matters relating to built heritage in the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	Archaeology Working Group Meeting.

Date	Format	Topic/Description
<u>February 2026</u>	<u>Meeting</u>	<u>National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.</u>
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	Thematic Group meeting – proposed viewpoint locations - Essex
April 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023	Meeting	EIA viewpoints meeting - Essex
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Meeting	EACN (Statutory Consultation) Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.

Date	Format	Topic/Description
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Essex North.
October 2024	Meeting	Focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated view point information data following from the landscape thematic workshops
November 2024	Meeting	Thematic group meeting to discuss viewpoints and methodology – Essex North.
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
<u>September 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)</u>
<u>October 2025</u>	<u>Meeting</u>	<u>Meeting to discuss Tree and Hedgerow removal in Tendring following initial meeting with the Landscape team in September 2025.</u>
<u>October 2025</u>	<u>Meeting</u>	<u>Follow up optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)</u>
<u>January 2026</u>	<u>Meeting</u>	<u>Joint meeting attended by LPA's who are represented by EPS for Landscape to discuss the Statement of Common Ground.</u>
Socio-economics, Recreation and Tourism		
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.

Date	Format	Topic/Description
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to Tendring District Council which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, amber, green status shows the level of agreement with TDC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement Status for Matters Presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.

~~3.1.4 Sections that remain highlighted in yellow within these tables show points where both parties will seek to discuss and where possible agree a position in due course. The parties have been unable to do so at this stage because the relevant information is still being authored ahead of submission of the DCO application. These points will be the subject of ongoing discussion with stakeholders once the Environmental Statement and other relevant documentation is published.~~

~~3.1.5~~ 3.1.4 Table 3.2 to Table 3.12 provide the matters agreed, not agreed or under discussion in relation to the various topics.

3.2 Project Development, Description and Design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	<p>Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia.</p> <p>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p> <p><u>Updated position (February 2026):</u> <u>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p>TDC would refer to its Relevant Representation submission (27 November 2025), section 4.1 – Need Case and Alternatives. TDC accepts that network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted / planned electricity generation in the East Anglia region. However, despite the acceptance of the need, TDC's in-principle objection continues to be for an integrated offshore solution that avoids the use of overhead powerlines due to their impact on communities and the environment. TDC objected in the strongest of terms to the proposed Norwich to Tilbury powerline and connections to a main substation within the Tendring District—this position remains unaltered for the reasons previously set out in our statutory consultation response dated 27 March 2025 and earlier non-statutory consultation responses. TDC also questioned the need for the Norwich to Tilbury project and why alternative proposals, such as coordinated offshore</p>	<p>Not agreed/Under discussion</p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p>and HDVC undergrounding, had not been fully explored to deliver the same infrastructure capacity (including energy security, carbon reduction and other environmental benefits) in the same, or potentially quicker timescale as the development proposed.</p>	
3.2.2	Project timing	<p>Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.</p> <p><u>Updated position (February 2026):</u> <u>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p><u>TDC would refer to it's Relevant Representation submission (27 November 2025), section 4.1 Need Case and Alternatives. TDC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While TDC has had regard to the TEC Register, TDC considers it essential that in determining what future expansion is needed, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The applicant must not restrict the justification on future network expansion solely based on the ESO contracted position. Further engagement would be welcomed on this matter. TDC commented in 2024 that the choice of route and timing has not received adequate strategic appraisal as identified in the Hiorns Report (Nov</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			2023) which concludes that the scheme is not needed by 2030.	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p><u>Updated Strategic Options and Backcheck Review documents [APP-355, APP-357]</u></p> <p>published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p> <p><u>Updated position (February 2026):</u></p> <p><u>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p><u>TDC would refer to its Relevant Representation submission (27 November 2025), section 4.2 – In this section TDC sets out its clear objection to NGET's chosen location of the EACN near Ardleigh/Little Bromley and the associated underground cable corridors and new pylon route.</u></p> <p><u>TDC argues that NGET's site-selection process is flawed, insufficiently transparent, and overly driven by customer convenience, rather than environmental, landscape, agricultural, or community considerations.</u></p> <p><u>TDC contends that alternative sites further west (e.g., RAF Boxted, nearer the A12) were dismissed without proper evidence, even though they would:</u></p> <ul style="list-style-type: none"> <u>• avoid large areas of Best and Most Versatile (BMV) farmland,</u> <u>• reduce pylon length by ~10km,</u> <u>• lessen landscape, heritage, and residential impacts,</u> <u>• better align with the prevailing route corridor, and</u> <u>• sit closer to major infrastructure, reducing construction impact.</u> <p><u>TDC systematically challenges NGET's technical arguments on constraints, cable routing, corridor widths, construction complexity, future flexibility,</u></p>	<p><u>Under discussion</u></p> <p><u>Not agreed</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>and deliverability, stating that these issues are either shared by the chosen location, overstated, or unproven. The section also highlights serious concerns about the arc-shaped pylon route north of Ardleigh, which breaks the Horlock Rules on linearity and brings pylons unacceptably close to settlements and sensitive landscapes. Overall, TDC argues the current EACN location causes disproportionate, avoidable, and long-term harm to communities and the environment in north-west Tendring, and that National Grid has not justified rejecting better-performing alternatives. TDC are opposed to the onshore route and have questioned the necessity of the route in their statutory consultation response, particularly the diversion into the northwest of Tendring.</u></p>	
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p><u>Updated Strategic Options and Backcheck Review documents</u> published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p> <p>The work undertaken shows that undergrounding, including using HVDC cables, would be significantly</p>	<p><u>See above, in addition, TDC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length and through and around settled communities in TDC. An integrated offshore solution would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p><u>Updated position (February 2026):</u> <u>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p><u>Localised design responses involving undergrounding and /or alternate pylon design/routing as part of the application of the mitigation hierarchy, should not be discounted by NGET. TDC considers that such an approach would not be contrary to national policy statements and would actually be consistent with Holford Rule 7, where it states projects should be routed to minimise as far as possible effects on development. In the 2024 statutory consultation response, TDC commented an offshore option is preferred. TDC comment that the environmental and community impacts could be avoided through an offshore solution.</u></p>	
3.2.5	Siting selection process	<p>At each consultation period, National Grid has published a suite of documents which detail how the design has been developed (based on environmental and engineering assessments, and stakeholder feedback) in addition to showing the method used to evaluate our strategic choices and how we review and backcheck these methods, and how we have considered stakeholder feedback. Key documents include:</p> <ul style="list-style-type: none"> • Corridor and preliminary routeing and siting study (2022) • 2022 Non-statutory feedback report • 2023 Strategic Options Backcheck and Review • 2023 Design Development Report • 2023 Non-statutory Feedback Report • 2024 Strategic Options Backcheck and Review 	<p>TDC believes that all the benefits and disadvantages, including any cost benefits or disadvantages of any and all alternatives should be properly and transparently considered, and then carefully weighed against the benefits and disadvantages of National Grid's preferred approach.</p> <p>This crucial exercise, despite the scale of this project and the considerable magnitude of the harmful impacts of <u>the</u> National Grid's preferred route, appears to remain outstanding. Or if it has been undertaken, the evidence and full detail appears to remain unavailable to the wider public and all the interested</p>	<p><u>Not Agreed Under discussion</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<ul style="list-style-type: none"> 2024 Design Development Report 	parties and communities that will be so greatly affected by this project.	
Project development process - Design				
3.2.6	East Anglia Connection Node (EACN) substation	<p>National Grid has previously considered a number of alternative sites for the EACN substation during the initial siting work as set out in the CPRSS and 2023 and 2024 DDRs. The decision making about siting considers the potential effects within the context of relevant policy, notably NPS EN-1, EN-5 and the Electricity Act 1989.</p> <p>We have kept our preliminary decisions under review and continue to consider the EACN substation as proposed to be the preferred location on the basis that an alternative further west presents greater uncertainty on factors including deliverability and increased construction risk and is not compatible with our duties.</p> <p><u>Updated position (February 2026):</u> <u>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p><u>See TDC's Relevant Representation submission (27 November 2025), section 4.2.</u></p> <p><u>TDC Response to Targeted Consultations (27/03/2025):</u></p> <p>The choice of the EACN site east of Ardleigh contradicts this prevailing route. The environmental, landscape, and community impacts of locating the EACN here are severe. With the current<u>currently</u> proposed onshore substation locations for the Five Estuaries and North Falls windfarms, as well as the Tarchon Interconnector and National Grid's Norwich to Tilbury EACN all in one area, the projects are functionally interdependent, and the in-combination and cumulative effects will be extremely damaging.</p> <p>TDC strongly recommends considering alternative sites along the A12 corridor, which are better aligned with the existing pylon route. This would eliminate the need for a considerable number of new pylons and overhead lines between Ardleigh and Little Bromley, newly engineered and wide haul routes in rural locations close to small settlements, and yet more new and harmful pylons and overhead lines north and northwest of</p>	<p>Under discussion <u>Not agreed</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			Ardleigh. It may also prevent the underground cable section curving south of the Dedham Vale National Landscape.	
Project development process – Consultation				
3.2.7	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the <u>Consultation Strategy</u> , and responses to feedback received during consultation are included in the <u>Feedback Report</u> . The non-statutory consultation was undertaken in accordance with the published <u>Consultation Strategy</u> .	Refer to TDC's adequacy of Consultation Milestone response dated 6 May 2025.	Under discussion
3.2.8	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the <u>Consultation Strategy</u> , and responses to feedback received during consultation are included in the <u>Feedback Report</u> . The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	Refer to TDC's adequacy of Consultation Milestone response dated 6 May 2025.	Under discussion
3.2.9	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the <u>Statement of Community Consultation (SoCC)</u> . Statement of Community Consultation (SoCC) . Responses to feedback received during statutory consultation are contained will be made available at DCO submission within the Consultation Feedback Report.	Refer to TDC's adequacy of Consultation Milestone response dated 6 May 2025.	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>The statutory consultation was undertaken in accordance with the published SoCC.</p>		
3.2.10	2025 targeted consultation	<p>Targeted consultations for Essex took place from 25 February - 27 March 2025 Details of these consultations are outlined in the <u>Targeted Consultation Strategy</u> and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation <u>are contained</u>will be made available at DCO submission within the Consultation Feedback Report.</p> <p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy.</p> <p>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).</p>	<p>In the 2025 consultation response, TDC raised concerns around transparency and availability of information which raised doubts over the legitimacy of this and previous public consultation exercises.</p>	Under discussion
Other matters as required				
3.2.11	Community Benefits	<p><u>Socio-economic impacts on the local economy are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.</u></p> <p><u>Updated position (February 2026):</u></p> <p>In <u>addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its</u>March 2025 the government announced guidance <u>on community funds</u> for delivering</p>	<p>TDC strongly encourage National Grid to positively respond to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024, particularly having regard to the Governments recently published Community Funds for Transmission Infrastructure.</p> <p><u>TDC considers the N2T project will have extensive residual impacts that adversely affect the local economy and environment, as well as the health and</u></p>	Under discussion Not agreed

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>community benefit packages for communities hosting new, onshore transmission infrastructure (DESNZ, 2025). The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.</p> <p>projects. This would be delivered outside the development consent process, since it is guidance is clear that community benefit matters should be separate from, and not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (-the planning process. Outside of the DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025). Therefore, any community benefit or investment would be captured under the process, National Grid Community Grant Scheme and dealt will work with stakeholders to understand the opportunity and delivery of this funding, in line with separately to the EIA. guidance.</p>	<p><u>wellbeing of communities in TDC and Essex, especially along or close to the project route, and which cannot be sufficiently mitigated or compensated through the planning regime. Also, the national benefits will not offset the harm at a local level.</u></p> <p><u>TDC strongly encourage NGET to respond positively to the issue of social value and community benefits as set out in all our responses to statutory and non-statutory consultations in 2024 and 2025.</u></p> <p><u>In particular, it is imperative that significant benefits should be realised from N2T for education, skills, and employment for the district of Tendring during construction and operation, alone and cumulatively with other NSIPs, and not least because these projects will disproportionately affect the District of Tendring.</u></p> <p><u>There is still no tangible or legally binding offer on the table or in the DCO submission from NGET around education, skills, and employment packages that will benefit TDC or indeed the North Essex region, and there has been little progress from NGET on this matter.</u></p> <p><u>It is considered that this will be a key area of disagreement unless clarity is provided as soon as practically possible.</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<u>Further discussion would be welcomed on this topic.</u>	

3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 8.2 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	<u>The ES has identified the relevant legislation, policy and guidance.</u> ES not yet available, cannot state position. Essex Place Services (EPS) response: Have not received the ES to review but based on the PEIR this is agreed.	Under Discussion <u>Agreed</u>
EIA – Approach and Methods				
3.3.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. <u>Updated position (February 2026):</u>	TDCs ES not yet available, cannot state position is. Cannot comment on the sufficiency of survey data since that information has not been shared yet. EPS response: Have not received the ES to review, but based on the PEIR	Agreed Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</u></p>	<p>sufficient desktop and survey data has been collected for. Cannot comment on the ES.</p> <p><u>EPS confirmed in meeting regarding the Statementsufficiency of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to bat survey data which requires further since that information and is noted in ID3.3.18.</u></p> <p>has not been shared yet.</p>	
3.3.4	Assessment methodology	The methodology for assessing Ecology and Biodiversity was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Ecology and Biodiversity was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	<p>National Grid issued a technical note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p><u>Updated position (February 2026):</u> <u>Please see ID3.3.19 in respect</u>No Comments <u>to additional information</u>date on bat<u>the Technical Note received from TDC, therefore it is assumed that the survey methodology</u> is agreed.</p>	<p>National Grid issued a technical note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p><u>The survey methods used are largely accepted.</u></p> <p>No comments to date on the Technical Note received from TDC, therefore it is assumed that the survey methodology is agreed.</p> <p>EPS: Comments on methods were issued with the PEIR comments. Tech Note presented no/minimal new information so see PEIR comments.</p>	Agreed

ID	Matter	National Grid's Position	Tending District Council's Position	Status
3.3.6	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The key parameters and assumptions presented are considered appropriate.</p> <p><u>Updated position (February 2026):</u></p> <p>National Grid has committed to a 5-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for DCO projects of this scale. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the 7.1 Biodiversity Net Gain Report [APP-299].</p>	<p><u>The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4))", is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement.</u> ES not yet available, cannot state position.</p>	Under Discussion

EIA – Baseline Conditions

3.3.7	Baseline conditions and receptors	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The baseline conditions and receptors presented are considered appropriate.</p> <p>January 2025, National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment.</p> <p>In May 2025, National Grid held a further meeting to discuss comments from an updated proposed</p>	<p><u>Circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; TDC's position is pending.</u></p> <p><u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is</u></p>	Agreed Under Discussion
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ID	Matter	National Grid's Position	Tending District Council's Position	Status
		<p>mitigation for species outside the remit of Natural England.</p> <p>Updated position (February 2026): <u>Further survey information from the 2025 season has been submitted to PINS in November 2025, achieving coverage of 97% of the Order Limits.</u></p>	<p><u>considered agreed for all areas apart from in relation to baseline conditions and receptors for bats which is discussed further at ID3.3.20.</u>ES not yet available, cannot state position</p>	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated.</u> <u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</u>ES not yet available, cannot state position</p>	<u>Agreed Under Discussion</u>
3.3.9	Standard mitigation	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>The standard mitigation measures summarised in the ES section 8.6 and stated in the OCoCP are largely appropriate and anticipated as adequate if effectively implemented.</u> <u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID3.3.21.</u>ES not yet available, cannot state position</p>	<u>Agreed Under Discussion</u>
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. Additional mitigation is considered appropriate and adequate,</p>	<p><u>See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.9).</u></p>	<u>Agreed Under Discussion</u>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		in terms of its nature and scale, to address potential effects.	<u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. ES not yet available, cannot state position</u>	

EIA – Assessment Conclusions

3.3.11	Construction effects	<p>The assessment of effects during construction is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The assessment of effects during construction presented is considered appropriate.</p> <p>The necessary measures will be implemented to ensure the protection of ancient woodlands where required.</p> <p>The use of Heras fencing with camouflage netting attached is a considered mitigation technique to reduce the potential impact of hedgerows located within the draft order limits.</p> <p><u>Updated position (February 2026):</u></p> <p><u>Further survey information from the 2025 season has been submitted to PINS in November 2025, achieving coverage of 97% of the Order Limits [AS-028 to AS-048].</u></p> <p><u>The survey approach to bat roost surveys has been agreed with Natural England (the statutory responsible body for bats) and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost</u></p>	<p><u>The assessment of bat-related impacts lacks transparency because it only evaluates long-term effects, without presenting predicted short- or medium-term impacts. The reliance solely on Ground-Level Tree Assessments (GLTAs) limits confidence in the accuracy of the roosting-bat impact assessment, which must be robust before any lawful planning decision is made.</u></p> <p><u>Within the surveyed 87.5% of the Order Limits, 287 Potential Roost Features for multiple bats (PRF-M) trees and 1,773 Further Assessment Required (FAR) trees were identified as detailed within 6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [APP-171], while an estimated 314 PRF-M/FAR trees fall within the un-surveyed 12.5% and it is unclear what percentage of the un-surveyed 12.5% falls within the TDC area. The ES does not make clear how many significant bat roosts may be lost, what the highest-value roosts at risk may be, or</u></p>	Under discussion
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affected will be covered under a Natural England licence following pre-agreed mitigation measures.

National Grid welcomes continued engagement with TDC on this matter.

how impacts might differ among Essex bat species.

The ES acknowledges that without mitigation, the loss or disturbance of bat roosts could have permanent medium to large negative effects, especially if maternity roosts are lost. Despite this, the residual-impact assessment assumes that all roost losses—regardless of their significance—would result in only negligible cumulative effects, simply because compensation (e.g., two bat boxes per roost lost) would be provided under a derogation licence. This assumption is not considered credible given earlier concerns (referenced in ID 3.3.9).

Overall, the approach appears to be seeking consent before surveys are complete—yet no such DLL system exists or has been approved for roosting bats, making the method unsupported and inappropriate.

TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion. TDC stated at statutory consultation that for hedgerows and trees there was a lack of information with regards to potential impacts on specific hedgerows and ancient trees located within the draft Order Limits.

EPS Comments – Have not received the ES to review.

ID	Matter	National Grid's Position	Tending District Council's Position	Status
3.3.12	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026].</p> <p>The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>The assessment of effects during operation (and maintenance) is considered appropriate.</p> <p>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. ES not yet available, cannot state position</p>	Agreed Under Discussion

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.3.13	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated position (February 2026):</p> <p>Full details of the Environmental Clerk of Works (ECoW) qualifications / experience will be provided within the final CoCP. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor.</p> <p>National Grid will continue to engage with TDC on this matter.</p>	<p>Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, TDC would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. TDC would also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project.</p> <p>B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey class licenced (level 2+ if endoscopy required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd Iterations were rough outline drafts. TDC is currently engaging with the latest CoCP</p>	Under Discussion
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ID	Matter	National Grid's Position	Tending District Council's Position	Status
			<p>and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</p>	
3.3.14	Outline LEMP	<p>The <u>Outline LEMP [AS-046]</u> includes all relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES <u>[AS-026]</u> and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline LEMP <u>[AS-046]</u>.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP <u>[AS-046]</u>.</p> <p>A further iteration of the Outline LEMP <u>[AS-046]</u> was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated position (February 2026):</u></p> <p><u>Natural England (the statutory responsible body for bats) has approved the method to classify potential roost features which are in line with standard guidelines, as detailed within Natural England's SoCG submitted at Deadline 1. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a</u></p>	<p><u>Regarding paragraph 6.1.8 (pages 39 and 40) of the OLEMP, TDC seeks clarification on how trees are assessed for bat hibernation potential, particularly why fewer trees are classified as having hibernation suitability compared with the number of PRF-I and PRF-M features. TDC also asks for transparency on the criteria that exclude certain Potential Roost Features from being considered suitable for hibernation.</u></p> <p>The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</p>	Under Discussion

ID	Matter	National Grid's Position	Tending District Council's Position	Status
		<p><u>project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility.</u></p> <p><u>The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above.</u></p> <p><u>National Grid welcomes continued engagement with TDC on this matter.</u></p>		
Other matters as required				
<u>3.3.15</u>	<u>Biodiversity Net Gain (BNG) – Onsite and Assessment</u>	<p><u>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects.</u></p> <p><u>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</u></p> <p><u>Updated position (February 2026):</u></p> <p><u>The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment.</u></p> <p><u>National Grid welcomes continued engagement with TDC on this matter.</u></p>	<p><u>TDC welcomes the commitment to deliver at least 10% BNG but encourages NGET to adopt a higher BNG target, noting that the Essex Local Nature Partnership—including local planning authorities—is moving toward shared, measurable targets of 20% BNG.</u></p> <p><u>Recent viability work (<i>Viability Assessment of Biodiversity Net Gain in Essex, February 2025</i>) shows that 20% BNG is both achievable and viable, aligns with the NPPF's emphasis on measurable biodiversity gains, and exceeds the Environment Act 2021 minimum standard of 10%.</u></p>	<u>Under discussion</u>

3.3.164 5	Biodiversity Net Gain (BNG) - <u>Offsite</u>	<p><u>Updated position (February 2026):</u> National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. <u>The 7.1 Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.</u></p> <p>Offsite BNG will be <u>secured by a legal agreement and</u> delivered through collaboration with partners and purchased from commercially registered providers.</p> <p><u>The Applicant will consider Local Nature Recovery Strategy (LNRS) areas as part of the off-site BNG selection process, where sites are available, and appropriate to project circumstances.</u></p> <p><u>The BNG principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation.</u></p> <p>National Grid <u>welcomes continued engagements</u>shared the Biodiversity Net Gain strategy with <u>TDC</u>stakeholders in January 2025.</p> <p>No comments received to date on this matter<u>the BNG strategy from TDC.</u></p>	<p><u>TDC also stresses that BNG delivery should be spatially aligned with the Essex LNRS to ensure habitat creation contributes to strategic ecological networks and designated priority areas. Off-site BNG should be co-developed with stakeholders and LNRS delivery partners to ensure long-term ecological value.</u></p> <p><u>Further clarity is requested on how LNRS mapping and priority habitats have influenced BNG site selection and design. Transparent BNG accounting is needed to separate mitigation, enhancement, and compensation and avoid double-counting. Finally, TDC emphasises that where mandatory BNG planning applications are submitted these must include a Habitat Management and Monitoring Plan, approved in writing by the local planning authority, to ensure all agreed BNG outcomes are delivered and maintained over a 30-year period.</u></p> <p><u>EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still -TDC is currently engaging with the Biodiversity Net Gain strategy and will be providing comments in due course. Under discussion, and that further clarification is sought around Offsite BNG.</u></p>	Under discussion
3.3.174 5	Draft Arboriculture Impact	National Grid issued the draft AIA in March 2025. TDC comments are noted, and NG will continue to engage with TDC on this matter.	<p><u>There are concerns about the scope, accuracy, and level of detail presented in the AIA, particularly regarding trees protected by TPOs. To support a robust and transparent assessment, several</u></p>	Under discussion

Assessment
(AIA)

Updated position (February 2026):

The level of detail within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report [APP-236]** is based on the methodology outlined in Appendix J of **6.19 Scoping Report [APP-296]** and is considered appropriate for this stage of the Project.

Information on Tree Preservation Orders (TPOs) are included in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]** which has been developed using information provided by relevant Local Planning Authorities. With no TPO information provided by Tendring District Council (requested on 4 April 2025) the Project digitised TPO records based on the readily available Tendring Map Access Portal¹.

Commitment LV05 in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states that relevant protective principles would be applied to trees within the Order Limits and detailed within an Arboricultural Method Statement.

No specific measures have been applied to TPO trees, however, measures have been applied to all trees potentially impacted by the Project.

Commitment LV05 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states that relevant protective principles would be applied to trees within the Order Limits and detailed within an Arboricultural Method Statement which would be prepared by the Main Works Contractor(s) following detailed design and submitted to the Council for approval.

issues require clarification and correction.

TDC seeks clear evidence of the measures proposed to safeguard TPO-protected trees. Not all such trees appear to have been accurately or consistently annotated; for instance, some TPO trees on the southern side of Wick Lane, Ardleigh (covered by 20/00001/TPO) do not appear in Figure A13.6.1 of the AIA, despite others under the same order being shown. Additionally, many trees—whether listed individually or as groups—lack identification numbers, making it difficult to cross-reference and verify data. A consistent numbering system is needed to ensure transparency.

Further explanation is also required for trees described as “potentially affected,” which are currently marked only with orange dots without supporting information. Recent TPO designations made by TDC in areas such as Dead Lane, Wick Lane, Little Bromley Road, and Home Farm Lane must also be fully acknowledged and assessed, with further designations anticipated.

Hedgerows, which fall under The Hedgerow Regulations 1997, must be properly assessed for their ecological and landscape importance, and proposals should be adapted

¹ Tendring District Council (n.d.) Tendring Map Access Portal

Requests for TPO records were made to Local Planning Authorities and the resulting information was used by the Project. With no TPO information provided by Tendring District Council (requested on 4 April 2025) the Project digitised TPO records based on the Tendring Map Access Portal. Information on Tree Preservation Orders (TPOs) is presented in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.

Trees that were assessed as being of High or Moderate value (categorised using BS 5837:2012²) and in line with the methodology in **6.19 Scoping Report [APP-288 – APP-296]** have been allocated reference numbers.

The arboricultural assessment is based on the alignment presented within the development consent application. In the event the Limits of Deviation presented in section 4.5 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** alters the alignment during detailed design, the impacts to trees may also alter and are therefore currently reported as being ‘potentially affected’. Over all impacts to trees will be assessed and reported following detailed design. This is explained further in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**.

The limitations and assumptions in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report AIA [APP-236]** confirm when the desk study of TPOs was completed (May 2025). Any information on newly served TPOs would not change the mitigation

accordingly. The AIA itself acknowledges that the assessment is “preliminary” due to the absence of detailed design, making it difficult to quantify potential removals or evaluate likely impacts with confidence. It is also unclear whether the retention or pollarding of mature (and historic) oaks beneath overhead lines has been explored as a means of reducing unnecessary loss.

The cumulative effect of the proposed tree and hedgerow removals is expected to be severe, with compensatory planting requiring decades to re-establish lost amenity value and biodiversity. TDC is deeply concerned that substantial areas of the proposed development—including the project route, haul roads, and maintenance and access corridors—appear to be guided by evidence within the AIA and associated documents that is demonstrably inaccurate or incomplete. These deficiencies raise serious questions about the reliability of the project’s evidence base and whether it can be fully trusted as evidence to guide locational consideration as to the least harmful project route. Further detail on these matters will be set out in TDC’s LIR. Email response from TDC on 22nd April 2025 included a number of comments relating to the AIA.

² British Standards Institution (2012) BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations.

measures proposed but would be considered during detailed design.

Hedgerows within the Order Limits have been assessed in accordance with The Hedgerows Regulations 1997, as set out in **6.8.A3**

Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]. This assessment identifies hedgerows that qualify as 'important' under The Hedgerows Regulations 1997 based on ecological criteria. The findings have informed the routeing and design process to avoid important hedgerows wherever practicable, with any required removals limited to the minimum necessary working width. **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]** further considers the ecological value of hedgerows and secures mitigation through **7.2 Outline Code of Construction Practice [APP-300]**, including reinstatement. This ensures that hedgerow losses are minimised and that reinstated sections contribute positively to local habitat connectivity.

The 'preliminary' approach taken is typical of a Project of this scale and nature.

Consideration has been given to the retention and management of vegetation (including veteran trees) below overhead lines where reasonably practicable.

Section 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** states that details of tree protection would be provided within an Arboricultural Method Statement. It is envisaged that the Method Statement and Tree Protection Plans will be updated and made relevant for each construction stage and agreed with the Local Planning Authority and referenced in GG31 of **7.2 Outline Code of Construction Practice [APP-300]**. This aligns with

Schedule 3 Requirement 8 of the 3.1 Draft Development Consent Order [APP-056].

With respect to arboriculture, the tree surveys undertaken in line with the methodology set out in Appendix J of 6.19 Scoping Report [APP-296] with the baseline data used to inform the design process and will continue to be a consideration during detailed design.

The assessments undertaken and presented in the Environmental Statement (Volume 6 of the DCO Application) are based on the design information presented in 6.4 Environmental Statement Chapter 4 – Project Description [APP-131] and 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP- 133].

The Applicant considers that the information in its DCO application is robust and has been prepared in accordance with relevant statutory requirements, and furthermore it was deemed sufficient to enable it to be accepted for Examination by the Planning Inspectorate. The Applicant welcomes any further clarification from TDC on aspects of the documentation it deems deficient and will respond to any specific points raised by TDC in their Local Impact Report.

3.3.18 Data sources (bats)

Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES [APP-158].

Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. This further survey information is presented within Chapter 8 (Ecology and

As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; TDC's position is pending.

Under discussion

		<p><u>Biodiversity) of the ES [AS-026], submitted to PINS in November 2025</u></p> <p><u>National Grid will continue to engage with TDC on this matter.</u></p>		
3.3.19	<u>Survey Methodology (Bats)</u>	<p><u>Updated position (February 2026):</u></p> <p><u>National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</u></p> <p><u>All methodologies for surveying licensable species have been agreed with Natural England.</u></p> <p><u>The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>ECC consultants (that TDC is relying on) have informed us they have been provided with extremely limited amount of ecological survey information to review, which is preventing any meaningful assessment and comment.</u></p> <p><u>Discussions around this are ongoing.</u></p> <p><u>Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, TDC supports ECC in that we believe further survey efforts prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data-based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/ compensation scheme.</u></p>	<u>Under discussion</u>
3.3.20	<u>Baseline conditions and receptors (Bats)</u>	<p><u>The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The baseline conditions and receptors presented are considered appropriate.</u></p> <p><u>The survey approach to bat roost surveys has been agreed with Natural England and is considered a</u></p>	<p><u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the baseline conditions and receptors for roosting bats requires further information and review.</u></p>	<u>Under Discussion</u>

	<p><u>pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>		
<p><u>3.3.21</u> <u>Standard mitigation (Bats)</u></p>	<p><u>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and set out in the Outline CoCP [APP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>The mitigation approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</u></p> <p><u>National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>Measure B16’s assumption that any action requiring a Natural England derogation licence can be “reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit” is considered unsound. TDC supports ECC and considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable ‘reasonable anticipation’ of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID3.3.11.</u></p> <p><u>TDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for bats requires further information and review.</u></p>	<p><u>Under discussion</u></p>

3.41.1 Air Quality

3.4 Green Infrastructure

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Green Infrastructure

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
<u>Ecology and Biodiversity Matters</u>				
<u>3.4.1</u>	<u>Data sources (Ecology Matters)</u>	<p><u>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026].</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>In respect of Green Infrastructure matters from Essex County Council (on behalf of TDC): The Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study to inform the identification of existing habitats and to guide the selection of appropriate locations for mitigation and compensation measures. It provides a spatial framework for identifying opportunities to enhance biodiversity and deliver nature recovery across Essex. Including LNRS mapping ensures alignment with national policy objectives and supports coordinated, cross-boundary environmental planning that reflects local priorities and ecological networks.</u></p>	<u>Under discussion</u>
<u>3.4.2</u>	<u>Standard mitigation</u>	<p><u>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and set out in the Outline CoCP [APP-300]. The standard mitigation is considered appropriate and adequate, in</u></p>	<p><u>In respect of Green Infrastructure: TDC welcomes the inclusion of embedded and standard mitigation measures within the Outline LEMP and OCoCP. However, TDC would encourage NGET to further integrate GI principles within the mitigation hierarchy, ensuring that ecological, hydrological, and landscape functions are delivered in an integrated manner. GI should be designed to provide multifunctional benefits, such as flood mitigation, biodiversity enhancement,</u></p>	<u>Under discussion</u>

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tending District Council's Position</u>	<u>Status</u>
		<p><u>terms of its nature and scale, to address potential effects.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>and community wellbeing (PRoW) are maximised across the route where possible.</u></p> <p><u>TDC would recommend that GI corridors be aligned with existing ecological networks and PRoW to enhance connectivity and accessibility, particularly in areas of landscape sensitivity and community use.</u></p>	
3.4.3	<u>Additional mitigation</u>	<p><u>The consideration of additional mitigation measures are presented in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Document 7.1 Biodiversity Net Gain Report [APP-299] confirms that the Applicant will consider Local Nature Recovery Strategy areas as part of the offsite BNG selection process where sites are available and appropriate to project circumstances. The Applicant also aims to deliver biodiversity legacy ideally in reach of the three counties crossed by the Project (Norfolk, Suffolk and Essex).</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>In respect of Green Infrastructure: GI delivery should be explicitly aligned with the Essex GI Strategy and Essex GI Standards and reflect the priorities identified in the Essex LNRS, ensuring that mitigation and enhancement measures contribute to wider landscape-scale recovery.</u></p> <p><u>Where habitats such as hedgerows and trees are removed, they should be reinstated with enhanced hedgerow habitats using locally important native species and local seed stock, in consultation with wildlife groups across Essex.</u></p> <p><u>TDC recommends that discussions be held to secure off-site biodiversity compensation within Essex, with a preference for delivery within strategic habitat opportunity areas identified in the Essex LNRS. To ensure long-term ecological benefits, TDC also encourages the establishment of stewardship agreements with local wildlife groups such as Essex Wildlife Trust, ECC and Place Services.</u></p>	<u>Under discussion</u>

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
<u>3.4.4</u>	<u>Outline LEMP</u>	<p>The Outline LEMP includes all <u>relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and is appropriate.</u></p> <p><u>Meeting held in October to agree on the structure for the Outline LEMP [AS-046].</u></p> <p><u>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP [AS-046].</u></p> <p><u>A further iteration of the Outline LEMP [AS-046] was issued in May 2025 following the meeting and feedback in writing.</u></p> <p><u>The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the 7.1 Biodiversity Net Gain Report [APP-299]. Detail on habitat management and monitoring for the Environmental Areas will be set out in the final Landscape and Ecological Management post consent.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>In respect of Green Infrastructure from Essex County Council: ECC requests clarity on the governance and long-term monitoring arrangements for BNG delivery. ECC recommends that the Outline LEMP include a robust monitoring framework with adaptive management provisions and opportunities for stakeholder engagement to ensure the longevity and effectiveness of BNG measures.</u></p> <p><u>While HMMP and LEMP are standalone documents ECC recommend that the BNG delivery be cross referenced within the Outline LEMP and supported by a clear monitoring framework, including adaptive management provisions and community engagement.</u></p> <p><u>ECC recommends extending the monitoring period for landscape (GI) delivery to 10 years, in line with best practice demonstrated by other NSIPs (e.g. Five Estuaries and North Falls Offshore Wind Farms), and a 30-year management period for BNG/GI associated with EACN and substation landscape plans. The proposed 10-year monitoring period could be structured into two phases: an initial 5-year period of high-frequency establishment monitoring, followed by a subsequent 5-year period of lower-frequency development monitoring</u></p>	<u>Under discussion</u>
<u>3.4.5</u>	<u>Biodiversity Net Gain (BNG)</u>	<u>National Grid will deliver at least 10 % BNG with wider</u>	<u>Regarding Green Infrastructure (GI) and Biodiversity Net Gain (BNG), TDC requests</u>	<u>Under discussion</u>

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
		<p><u>environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers.</u></p> <p><u>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>clearer governance and long-term monitoring arrangements.</u></p> <p><u>TDC further proposes extending monitoring periods to ensure the longevity of landscape and BNG outcomes:</u></p> <ul style="list-style-type: none"> <u>10 years of monitoring for GI (mirroring best practice in other NSIPs).</u> <u>A 30-year management period for BNG and GI associated with the EACN and substation areas.</u> <u>NGED suggest structuring the 10-year monitoring into an initial 5-year high-frequency phase followed by 5 years of lower-frequency monitoring.</u> 	
<u>Landscape and Visual</u>				
<u>3.4.6</u>	<u>Embedded mitigation (Landscape and Visual)</u>	<p><u>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>In respect of GI: TDC recommends that Green Infrastructure be used as a key component of landscape mitigation, particularly in areas of high visual sensitivity and community use. TDC also supports the use of planting and habitat creation to soften visual impacts and enhance landscape character, and requests that GI proposals be aligned with the Essex LNRS priorities and local landscape strategies.</u></p>	<u>Under discussion</u>
<u>3.4.7</u>	<u>Additional mitigation (Landscape and Visual)</u>	<p><u>The consideration of additional mitigation measures are presented in Section 13.6 of Chapter 13</u></p>	<p><u>In respect of GI: TDC notes that significant residual landscape and visual impacts remain. TDC also recommends that NGED</u></p>	<u>Under discussion</u>

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
		<p><u>(Landscape and Visual) of the ES [APP-226]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>explore a range of compensation measures to offset the impacts of the proposal and deliver net environmental gain. These should include the enhancement of existing GI assets, investment in community-led landscape initiatives, and the creation of new accessible, high-quality GI open spaces, not only in Tendring but across Essex. Such measures would contribute to improved environmental outcomes and support the wider objectives of nature recovery and community wellbeing. Discussions have taken place with Place Services, Essex Wildlife Trust, the Biodiversity Net Gain (BNG) Officer, and the Local Nature Recovery Strategy (LNRS) Coordinator to explore opportunities for securing potential compensation measures and financial contribution within Essex. TDC also recommends securing off-site compensation within Essex, ideally in LNRS strategic habitat opportunity areas, and establishing long-term stewardship agreements with wildlife groups across Essex such as Essex Wildlife Trust, and TDC and other Local Authorities.</u></p>	
3.4.8	<p><u>Outline LEMP (Landscape and Visual)</u></p>	<p><u>The Outline LEMP [AS-046] includes all relevant operational related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES [APP-226] and is appropriate.</u></p>	<p><u>In respect of GI: TDC notes that changes in the OLEMP terminology from “enhanced mitigation” to “landscape compensation” require clarification to ensure these are not repurposed mitigation measures, risking double-counting.</u></p> <p><u>TDC recommends that compensation measures be clearly distinguished from</u></p>	<p><u>Under discussion</u></p>

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
		<p><u>Meeting held in October 2024 to agree on the structure for the Outline LEMP [AS-046].</u></p> <p><u>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP [AS-046].</u></p> <p><u>A further iteration of the Outline LEMP [AS-046] was issued in May 2025 following the meeting and feedback in writing.</u></p> <p><u>TDC comments are noted, and National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence.</u></p> <p><u>TDC recommend that additional mitigation and compensation measures be considered in consultation with ECC Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.</u></p>	

3.5 Air Quality

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Tendring District Council's Position</u>	<u>Status</u>
<u>EIA – Regulatory, Planning Policy Context and Guidance</u>				
<u>3.54.1</u>	<u>Policy and legislation</u>	<p><u>The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 7.2 of Chapter 7 (Air Quality) of the ES [APP-147].</u></p> <p><u>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	<p><u>TDC agree that relevant policies, legislation and guidance have been considered in the Air Quality assessment. Latest ES not yet available, cannot confirm position</u></p>	<p><u>Under discussion Agreed</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Approach and Methods				
3.54.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.54.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 of Chapter 7 (Air Quality) of the ES [APP-147].	<u>TDC agrees that that the desk based data collected in the ES is appropriate, comprehensive, and sufficient to inform the air quality assessment for Tendring District and the wider study area.</u> Latest ES not yet available, cannot confirm position	Under discussion Agreed
3.54.4	Assessment methodology	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.54.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of Chapter 7 (Air Quality) of the ES [APP-147]. The key parameters and assumptions presented are considered appropriate.	<u>TDC agree that key parameters and assumptions associated with Air Quality are acceptable because it uses established national and local datasets, including:</u> <ul style="list-style-type: none"> <u>Defra background maps, AQMA datasets, and Local Authority monitoring data (including Tendring's)</u> <u>Environment Agency industrial installation register</u> <u>OS mapping for receptor identification</u> 	Under discussion Agreed

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
<p style="text-align: right;"><u>MAGIC and APIS for designated ecological sites</u> Latest ES not yet available, cannot confirm position</p>				
<p>EIA – Baseline Conditions</p>				
3.54.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Air Quality are presented in Section 7.5 of Chapter 7 (Air Quality) of the ES [APP-147]. The baseline conditions and receptors presented are considered appropriate.</p>	<p><u>TDC agrees that the relevant part of the ES uses appropriate datasets, accurate local monitoring information, and well-designed receptor framework that reflects Tendring's rural character and air quality profile. Therefore, the baseline conditions and receptors presented in Section 7.5 are considered appropriate for the District of Tendring.</u> Latest ES not yet available, cannot confirm position</p>	Agree Under discussion
<p>EIA – Embedded, Standard and Additional Mitigation Measures</p>				
3.54.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of Chapter 7 (Air Quality) of the ES [APP-147]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Updated position (February 2026):</p> <p><u>The embedded mitigation that is relevant to air quality on this Project is route alignment and the inclusion of an almost continuous haul road. The alignment of both is enforced through the Order Limits not the Outline CoCP [APP-300].</u></p> <p><u>There is scope in the Outline CoCP [APP-300] for agreeing location specific mitigation measures once construction activities and locations are further</u></p>	<p><u>TDC agree that baseline pollutant levels (Nitrogen Dioxide; Particulate Matter up to 10 micrometres and Fine Particulate Matter up to 2.5 micrometres) are below national standards, and no AQMAs exist within 2 km of the Order Limits. TDC also acknowledge, as per the relevant policies and guidance on Air Quality mitigation, that mitigation needs to control modest, shortterm construction related emissions.</u></p> <p><u>The scale of the proposed measures including haul road usage, receptor sensitive dust controls, and strict plant emission standards — is considered</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>developed through detailed design. These are considered under standard and additional mitigation rather than embedded mitigation. The implementation of these measures would be secured through the DCO, as it will require compliance with the final CoCP which would be approved by relevant Local Planning Authorities prior to the commencement of construction.</u></p>	<p><u>proportionate to the low baseline sensitivity evidenced for Tendring.</u></p> <p><u>TDC requests that proposed the embedded measures are fully incorporated into the Outline CoCP (secured by DCO Requirement 4) and the Outline Dust Management Plan, to be updated by the relevant contractors at the times specified and to ensure:</u></p> <ul style="list-style-type: none"> <u>Measures are enforceable by TDC</u> <p><u>Additional site-specific controls can be applied where local receptors (e.g., Ardleigh, Little Bromley and areas in between in particular Bentley Road and other small hamlets) require additional tailored protection</u></p> <p><u>Latest ES not yet available, cannot confirm position</u></p>	
3.54.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of Chapter 7 (Air Quality) of the ES [APP-147] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>TDC agrees that section 7.7 of the ES demonstrates that with standard mitigation in place (to be secured via the DCO):</u></p> <ul style="list-style-type: none"> <u>Dust impacts become not significant, including at the most severely impacted sites/areas.</u> <u>Traffic related NO₂, PM₁₀ and PM_{2.5} effects remain negligible.</u> <u>Generator/NRMM emissions are not significant.</u> <p><u>The standard mitigation measures appear to be fully aligned with recognised national guidance and are</u></p>	Agreed Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>secured through enforceable DCO requirements. TDC holds no evidence that would call into question the adequacy or effectiveness of these measures. Latest ES not yet available, cannot confirm position</u></p>	
3.54.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 7.6 of Chapter 7 (Air Quality) of the ES [APP-147]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>The submitted evidence concludes that with standard and additional mitigation in place:</u></p> <ul style="list-style-type: none"> <u>• Dust effects are not significant, including at the most severely impacted receptors</u> <u>• Traffic and plant related emissions remain negligible</u> <u>• Sensitive receptors (residential and ecological) in Tendring are adequately protected</u> <p><u>TDC holds no counter evidence to suggest that the additional mitigation put forward, together with the embedded imitation, will not be suitable to control air-quality impacts associated with the project, subject to all these measures being appropriately secured in the DCO in an appropriate, adequate and enforceable manner. Latest ES not yet available, cannot confirm position</u></p>	Agreed Under discussion

EIA – Assessment Conclusions

3.54.10	Construction effects	<p>The assessment of effects during construction is presented in Section 7.7 of Chapter 7 (Air Quality) of</p>	<p><u>TDC holds no evidence that suggests that the assessment of effects during construction is not proportionate,</u></p>	Agreed Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>the ES [APP-147]. The assessment of effects during construction presented is considered appropriate.</p>	<p>evidence based, or reflective of the district's rural receptor pattern and absence of AQMAs therefore we agree that the assessment of effects during construction presented is considered appropriate. Latest ES not yet available, cannot confirm position</p>	
3.54.1 1	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 7.7 of Chapter 7 (Air Quality) of the ES [APP-147]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Updated position (February 2026):</p> <p><u>Emissions related to maintenance and operational traffic are not quantified as this assessment was screened out in the EIA Scoping Report and was agreed within the EIA Scoping Opinion.</u></p> <p><u>There would be very small numbers of vehicles associated with operation and maintenance of the Project.</u></p> <p><u>The use of emergency combustion plant is considered to have a negligible impact on air quality as it is likely to be used only temporarily in emergency scenarios.</u></p> <p><u>The CoCP commitment relevant to emissions (GG19) from plant and generators currently governs construction activities only. Implementing the CoCP is the responsibility of the Main Works Contractor who would have resources to do this across the Project area.</u></p> <p><u>The assessment of effects during construction is presented in Section 16.7 (Residual Effects) of Chapter 16 (Traffic and Transport) of the ES [APP-271]. Construction traffic to be generated by the</u></p>	<p><u>TDC notes that the assessment is very high-level and also notes that operational activities generally generate very low emission potential. This inherently means that conclusions rely on assumptions that maintenance traffic remains minimal and that non-routine activities (e.g., emergency plant operation) are rare.</u></p> <p><u>Moreover, the ES appears to assume no material changes to local traffic flows, which is perhaps slightly optimistic given the emerging growth agenda for the region and the significant increase in housing numbers to be delivered over the next 30-40 years for the region. The ES also does not specifically quantify maintenance traffic emissions.</u></p> <p><u>The assessment depends on construction phase mitigation (e.g., plant selection, generator standards) remaining in place for any operational plant, and it is important that this requirement is secured via the DCO</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Proposed Project and its routing has been assessed and is not expected to result in any significant effects on the surrounding highway, following the measures identified within the 7.3 Outline Construction Traffic Management Plan [APP-309]. A detailed Construction Traffic Management Plan (CTMP) will be developed. It will be approved by TDC as relevant planning authority in consultation with Essex County Council (as highway authority) post consent under Requirement 4 of Schedule 3 of the 3.1 Draft Development Consent Order [APP-056].</u></p>	<p><u>and CoCP. Latest ES not yet available, cannot confirm position</u></p>	

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.54.1 2	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant mitigation measures specified in Chapter 7 (Air Quality) of the ES [APP-147] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated position (February 2026):</p> <p><u>As noted by the council there is scope in the Outline CoCP [APP-300] for agreeing location specific mitigation measures once construction activities and locations are further developed through detailed design.</u></p> <p><u>The implementation of these measures would be secured through the DCO, as it will require compliance with the final CoCP which would be approved by</u></p>	<p><u>TDC is generally content that all relevant mitigation measures are included in the Outline CoCP however notes that several air-quality controls rely on future contractor-led, site-specific Dust Management Plans and monitoring plans, meaning TDC or ECC (or the future unitary authority) will need to review these carefully at discharge stage.</u></p> <p><u>Some measures depend on professional judgement (e.g., determining high-risk locations, setting monitoring locations), which introduces variability in implementation.</u></p> <p><u>Whilst the Outline CoCP is comprehensive, its success hinges on robust supervision and enforcement, which will require resources and costs – and it is unclear how such monitoring/supervision will be funded,</u></p>	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>relevant Local Planning Authorities prior to the commencement of construction.</u></p> <p><u>High risk locations and monitoring locations would be determined following industry best practice IAQM construction dust guidance and IAQM construction site monitoring guidance.</u></p> <p><u>Implementing the CoCP is the responsibility of the Main Works Contractor who would have resources to do this across the Project area.</u></p>	<p><u>especially as the project corridor in the Tendring area is windy and long and construction activities are dispersed in a rural area in the north western part of the district and across sensitive rural receptors.</u>The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd Iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course—it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</p>	

Other matters as required

3.53.6 Noise and Vibration

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.65.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in Chapter 2 (Key Legislation and	<u>TDC agrees that all relevant legislation, policy and guidance have been identified and appropriately considered</u>	<u>Agreed Under discussion</u>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>Planning Policy Context) [APP-126] and Section 14.2 of Chapter 14 (Noise and Vibration) of the ES [APP-256].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p><u>to inform the assessment.</u> Unable to confirm position—ES not yet available</p>	
EIA – Approach and Methods				
3.65.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.65.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of Chapter 14 (Noise and Vibration) of the ES [APP-256] .	<u>Position agreed</u> Unable to confirm position—ES not yet available	<u>Agreed</u> Under discussion
3.65.4	Assessment methodology	Assessment approach agreed with Tendring District Council – the full assessment will be presented in the ES.	In July 2023, a technical note was shared with the Environmental Health Officers (EHOs) from Essex County Council and TDC to agree <u>on</u> the approach to undertake <u>undertaking</u> an operational noise impact assessment of the proposed EACN Substation within Tendring District together with using background noise monitoring data gathered for another project in the vicinity. Essex County Council deferred authority to TDC, who agreed that the proposed approach was acceptable.	Agreed
3.65.5	Key parameters and assumptions	Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of Chapter 14 (Noise and Vibration) of the ES [APP-	<u>Most key parameters and assumptions in Section 14.4 are broadly appropriate and align with recognised UK acoustic</u>	Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>2561. The key parameters and assumptions presented are considered appropriate.</p> <p>Updated position (February 2026):</p> <p>The background sound level survey locations undertaken by the Five Estuaries project are appropriate for EACN and include the nearest noise sensitive receptors to the site. Additionally, the use of this data was agreed by TDC through consultation of the tri-partite agreement for the management of cumulative noise. In any event, the assessment reflects the low background sound levels in the area and limits are set relative to national planning policy and guidance, both individually for the EACN, and cumulatively. The assessment is therefore adequately robust.</p> <p>With regards to haul roads, the noise assessment considered the lower threshold from the BS 5228 'ABC' method. Baseline survey data is therefore not required, as this would only serve to increase the threshold in higher noise level areas. This is not such an area, and the lower threshold is therefore applicable.</p> <p>The assessment is based on currently available information. However, the contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the Outline Code of Construction Practice (CoCP) [APP-300] and the Outline Noise and Vibration Management Plan(NVMP) [APP-306].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of the Outline CoCP [APP-300]. The Outline</p>	<p>and vibration assessment practice, though there are some areas where the assumptions rely on worst-case generalisations or third-party data that would benefit from later confirmation during detailed design.</p> <p>The EACN background sound levels appear to rely on Five Estuaries 2022 surveys, which were not undertaken specifically for this project. Although geographically relevant, the ES does not demonstrate explicitly how representative those exact points are of the EACN NSRs.</p> <p>There appears to be no confirmatory monitoring reported for rural receptors near haul routes in the TDC area, especially those anticipated to experience very large noise increases during construction (e.g. Bentley Road). Chapter 14 also assumes that third-party data are accurate. Using such assumptions (and not definite) may be acceptable at the EIA stage, however given the sheer increase in noise levels in the areas along Bentley Road and the new haul route south of Shot Road, these assumptions should be supported by mandatory verification before final design.</p> <p>Assumptions regarding mitigation are generally accepted, however, because some hotspots (e.g., Bentley Road) show major adverse impacts even with</p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<u>CoCP [APP-300] also includes a number of other related commitments.</u>	<u>Beset Practicable Means (BPM), explicit early design commitments are essential. Unable to confirm position – ES not yet available</u>	

EIA – Baseline Conditions

3.65.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of Chapter 14 (Noise and Vibration) of the ES [APP-256]. The baseline conditions and receptors presented are considered appropriate.</p> <p><u>Updated position (February 2026):</u> <u>Please see response above for ID3.6.5 where appropriate.</u></p>	<p><u>Generally acceptable and proportionate, however, there are limitations, especially regarding the reliance on thirdparty baseline noise measurements at the proposed EACN site and the absence of project specific vibration baseline data – these limitations can reduce confidence in the assessment and data that is being relied upon.</u></p> <p><u>Baseline data for a key location like the EACN appears to originate from Autumn 2022 noise surveys undertaken for the <i>Five Estuaries</i> Offshore Wind Farm ES, and not from a dedicated Norwich to Tilbury survey – confirmation is required here or preconstruction baseline monitoring should be required. TDC is not convinced that the EACN baseline data is representative of the site's actual location.</u></p> <p><u>It appears rural receptors near what will become very busy and noisy haul roads (e.g., Bentley Road) lack project specific baseline monitoring.</u></p> <p><u>TDC also request confirmatory pre-construction noise surveys at EACN and all other hotspots/severely affected</u></p>	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>areas (to be agreed by LPA), and detailed pre-condition vibration surveys for structures at risk (e.g., listed cottages) and all other buildings/ structures that will experience perceptible or more than perceptible construction vibration. Unable to confirm position — ES not yet available</u></p>	

EIA – Embedded, Standard and Additional Mitigation Measures

3.65.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Noise and Vibration effects, are set out in Section 14.6 of Chapter 14 (Noise and Vibration) of the ES [APP-256]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Updated position (February 2026):</p> <p><u>Please see response above for ID3.6.5 where appropriate.</u></p> <p><u>With regards to “Although the ES commits to things like plant selection, screening and enclosures there is little to no early indication of likely acoustic performance targets (e.g., maximum rating level relative to background) – this introduces great uncertainty for the LPA and affected communities and residents and should be addressed”, the ES (Chapter 14 (Noise and Vibration) of the ES [APP-256]) provides a firm indication of the impact of noise from the proposed EACN, both individually, and cumulatively. The assessment provides a worst-case assessment based on National Grid specification noise levels (i.e. the highest noise levels that can be produced), together</u></p>	<p><u>Generally acceptable, appropriate, and aligned with recognised good practice for a project of this scale, however, there are areas where further detail or commitments could strengthen assurance — especially regarding the practical implementation of noise-reducing design at locations such as the EACN and early road-surface improvements near known hotspots such as Bentley Road and the new haul route west of Little Bromley.</u></p> <p><u>Although the ES commits to things like plant selection, screening and enclosures there is little to no early indication of likely acoustic performance targets (e.g., maximum rating level relative to background) – this introduces great uncertainty for the LPA and affected communities and residents and should be addressed.</u></p> <p><u>It is unclear what specific embedded measures for construction traffic noise are proposed along Primary Access</u></p>	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>with mitigation in the form of standard enclosures. The predicted noise levels indicate that operational noise levels would be below acceptable limits, both individually and cumulative. In practice, given these reasonable worst-case assumptions, noise levels from the operation of the EACN would be expected to be lower than predicted. National Grid are committed to ensuring that appropriate noise and vibration mitigation measures are included in the EACN by commitments NV21 and NV22 of the Outline CoCP [APP-300]. The commitments in the CoCP are therefore deemed to be appropriate.</u></p>	<p><u>Roads (PAR) such as Bentley Road, where significant adverse impacts are predicted, and this clarity and details are needed asap so that affected communities and residents living on these PAR can begin to forward plan and consider the details. Unable to confirm position – ES not yet available</u></p>	
3.65.8	Standard mitigation	<p><u>Standard mitigation measures to reduce potential effects during construction are summarised in Section 14.6 of Chapter 14 (Noise and Vibration) of the ES [APP-256] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Updated position (February 2026):</u></p> <p><u>Please see response above for ID3.6.5 to ID3.6.7. In general, there appears to be a misunderstanding regarding the interpretation of best practicable means (BPM). Best practicable means are all encompassing and include the whole range of possible options available to the contractor to reduce the effects of construction noise and vibration, and are not merely “good practice measures”(although they are included). The contractors are therefore committed to employing the mitigation measures that they can practicably employ to reduce the effects of noise and vibration. Where there is discretionary wording such as “where practicable”, “where feasible”, “as far as reasonably</u></p>	<p><u>TDCs position is that the standard mitigation proposed is broadly appropriate and in line with accepted UK best practice, but they are not fully adequate for the specific sensitivities in Tendring, particularly around Ardleigh and Little Bromley. The local context in the most severely affected areas in Tendring (i.e Ardleigh and Little Bromley, and the rural areas around it and in between the two settlements) are not “typical”, instead, as repeatedly set out, these areas consists of:</u></p> <ul style="list-style-type: none"> <u>• Substandard, narrow rural roads</u> <u>• Residential clusters close to haul routes</u> <u>• Very high predicted construction traffic noise at some receptors (notably Bentley Road), which is currently a quiet rural area with low baseline noise conditions, and</u> 	<p><u>Not agreed or discussion</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>practicable”, this is to indicate that in some instances mitigation measures may not be practicable. For example, other non-acoustic constraints may limit certain mitigation measures (for example, a noise screen cannot block an access or a road, even if it would be acoustically beneficial to do so).</u></p> <p><u>Therefore, the strong commitment to employing BPM, together with undertaken detailed assessments should be given the appropriate high weight and not dismissed.</u></p>	<ul style="list-style-type: none"> • <u>Close proximity of properties to works areas</u> <p><u>Standard measures alone are far from sufficient to avoid significant or highly disruptive construction noise and vibration impacts for affected communities and residents.</u></p> <p><u>The 'standard' measures are set out in the documents and need not be repeated here; however these are merely standard good practice controls, not specific to Tendring and the measures proposed for these areas are not adequate because:</u></p> <ul style="list-style-type: none"> • <u>Construction traffic impacts in Tendring are unusually high, for the most part the highest and most impactful across the entire project route.</u> • <u>Standard BPM proposed (such as screening, quieter plant, limiting revs, etc.) does not address traffic noise, because HGV pass-bys cannot be enclosed or acoustically screened.</u> • <u>Vibration from HGVs depends more on road condition, speed, and proximity to dwellings — and less on plant selection although the size of the HGV and the nature of the load it carries are also factors.</u> • <u>Therefore, traffic related noise and vibration impact in these areas</u> 	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>cannot be adequately mitigated through standard measures alone and much more mitigation is needed and remains outstanding.</u></p> <ul style="list-style-type: none"> • <u>NGET chosen locations for its EACN, its permanent and temporary haul routes, its pylons and other paraphernalia are without exception characterised by extremely quiet rural baseline conditions. Background night-time levels are typically in the low 20s dB, as confirmed in Chapter 14. Standard mitigation is designed to reduce noise <i>at source</i>, but not to ensure absolute noise levels remain compatible with very low rural baselines. This means even “mitigated” construction noise can remain highly intrusive, character-changing and sleep-disturbing (as proposed e.g. babies and toddlers who tend to go to bed around 6:30-7pm) but also young children, adolescents and adults if works extend beyond core hours.</u> • <u>There are regular receptors very close to works and haul routes, in some instances within 20m of compounds, haul routes or cable trenching. In such locations, standard measures like “use quieter plant” or “minimise drop heights”</u> 	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>deliver only modest reductions (typically 5–10 dB).</u> <u>But predicted unmitigated levels can exceed those reductions by an order of magnitude and result in very significant impacts on residential amenity.</u></p> <ul style="list-style-type: none"> • <u>Many measures in the OCoCP rely on highly discretionary wording such as “where practicable”, “where feasible”, “as far as reasonably practicable”, “located away from sensitive receptors”.</u> • <u>Not only are these phrases ambiguous, but also, in constrained areas like Ardleigh and Little Bromley, these qualifiers reduce certainty for affected communities and residents that the mitigation will genuinely protect nearby residents, and in any event, the use of such phrases are unenforceable and will make any DCO condition that is predicated on such phrases ineffective, unenforceable and imprecise, and therefore failing the NPPF tests for planning conditions.</u> • <u>The Outline NVMP largely sets out process, not outcome, E.g – there are no receptor-specific noise limits; there are no commitments on maximum HGV flows at specific receptors, and no requirement for active monitoring where impacts are</u> 	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>predicted to be major (to name but a few).</u></p> <p><u>Therefore, the Standard Measures as set out are inadequate for the affected areas of the District of Tendring because:</u></p> <ul style="list-style-type: none"> <u>• Tendring has some of the highest predicted construction noise and vibration impacts on the entire route.</u> <u>• The environment is exceptionally quiet, meaning impacts are more noticeable.</u> <u>• Rural roads are already poorly suited to large HGV flows.</u> <u>• Several receptors are extremely close to the works.</u> <p><u>It is up to the project designers and promoters (and not TDC) to propose additional, workable, legally enforceable, efficient and precise measures to ensure residential amenity is protected, measures such as:</u></p> <ul style="list-style-type: none"> <u>• Additional Traffic specific controls</u> <u>• Enhances noise controls</u> <u>• Enhanced vibration controls</u> <p><u>Enhanced community protections</u> Unable to confirm position— ES not yet available</p>	
3.65.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 14.6 of Chapter 14 (Noise and Vibration) of the ES [APP-256] . Additional mitigation is	<u>For the TDC area (and along the entire project) the ES seems to conclude that no additional mitigation measures,</u>	<u>Not agreed</u> Und

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated position (February 2026):</u> <u>Please see response above for ID3.6.5 to ID3.6.8, particular around the interpretation of best practicable means (BPM) in 3.5.8.</u></p>	<p><u>beyond the embedded and standard measures identified in 3.6.8 above, are required. The ES argues that even though some Tendring-area receptors (including around Little Bentley, Little Bromley, and Bentley Road) may experience significant unmitigated construction effects, when standard BPM is applied (screening, quieter plant, operational practices, sequencing, traffic limits), residual effects become “not significant”.</u></p> <p><u>TDC questions this conclusion for the reasons set out in 3.5.8 and because the standard measures set out are inadequate for the affected areas. It therefore logically follows that TDC will disagree that additional mitigation is not required. According to the ES the only major effect identified is construction traffic noise on Bentley Road (Jasmine Cottage) where even with traffic management, a large adverse effect remains. But this is categorised as a traffic mitigation issue, not one requiring further acoustic mitigation beyond BPM, because the ES concludes that road proximity physically limits what noise mitigation is possible. TDC questions this unsatisfactory conclusion because there are at least 6 properties along Bentley Road set a similar distance back from the roadside edge than Jasmine Cottage. Vibration</u></p>	<p>of discussion</p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>exceedances near Little Bromley/ Little Bentley for several heritage structures are identified in the ES, but these are treated via site-specific BPM, monitoring, and pre-/ post-condition surveys, and the measures do not actually address the noise and vibration disturbances that the affected residents will experience. Unable to confirm position—ES not yet available</u></p>	

EIA – Assessment Conclusions

3.65.1 0	Construction effects	<p>The assessment of effects during construction is presented in Section 14.7 of Chapter 14 (Noise and Vibration) of the ES <u>[APP-256]</u>. The assessment of effects during construction presented is considered appropriate.</p>	<p><u>The construction phase Noise & Vibration assessment is considered appropriate for the Tendring area because:</u></p> <ul style="list-style-type: none"> <u>• It uses the correct standards and conservative thresholds.</u> <u>• It applies Tendring specific baseline data.</u> <u>• It identifies the correct receptors.</u> <u>• It transparently reports significant effects where unavoidable.</u> <u>• It justifies why further mitigation is impracticable in those locations.</u> <u>• It provides residual effect outcomes.</u> <p><u>It (correctly) does not claim that the worst of the impacts can be mitigated away. Unable to confirm position—ES not yet available</u></p>	<p><u>Under discussion</u> <u>Agreed</u></p>
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
3.65.1 1	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 14.7 of Chapter 14 (Noise and Vibration) of the ES [APP-256]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Updated position (February 2026): <u>ES Chapter 14 (Noise and Vibration) [APP-256] provides a firm indication of the impact of noise from the proposed EACN, both individually, and cumulatively. The assessment provides a worst-case assessment based on National Grid specification noise levels (i.e. the highest noise levels that can be produced), together with mitigation in the form of standard enclosures. The predicted noise levels indicate that operational noise levels would be below acceptable limits, both individually and cumulative. In practice, given these reasonable worst-case assumptions, noise levels from the operation of the EACN would be expected to be lower than predicted. National Grid are committed to ensuring that appropriate noise and vibration mitigation measures are included in the EACN by commitments NV21 and NV22 of the Outline CoCP [APP-300]. The commitments in the CoCP are therefore deemed to be appropriate.</u></p> <p><u>The background sound level survey locations undertaken by the Five Estuaries project are appropriate for the EACN, and include the nearest noise sensitive receptors to the site. Additionally, the use of these data was agreed by TDC through consultation of the tri-partite agreement for the management of cumulative noise. In any event, the</u></p>	<p><u>The ES uses correct methodology, appropriate standards, and baseline conditions representative of Tendring. The approach was agreed by Tendring DC's Environmental Health Officer in advance, and the level of detail is therefore proportionate.</u></p> <p><u>There are however limitations:</u></p> <ul style="list-style-type: none"> <u>• Operational assessments depend heavily on future detailed design work — therefore, the ES does not fully guarantee that impacts will remain minimal. The reliance on external baseline surveys (e.g. Five Estuaries) should be noted as a data limitation.</u> <u>• Maintenance impacts could be more significant (than the ES suggests) in low background rural Tendring (which has been repeatedly highlighted as an overriding characteristic of the area making a concentration of infrastructure of this nature entirely inappropriate for the area).</u> <u>• TDC expects robust further assessment at detailed design, especially given extremely low rural background levels.</u> <u>• Relevant DCO wording must ensure that future design cannot increase noise beyond the assessed limits.</u> 	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>assessment reflects the low background sound levels in the area and limits are set relative to national planning policy and guidance, both individually for the EACN, and cumulatively. The assessment is therefore adequately robust.</u></p> <p><u>An assessment of noise and vibration impacts during maintenance is provided in the ES Chapter 14: Noise and Vibration [APP-256]. With regards to the EACN, no significant effects are anticipated.</u></p>	<ul style="list-style-type: none"> <u>Updated on-site baseline noise monitoring should be required before finalising mitigation and should inform final mitigation required.</u> <p><u>Maintenance activities should be controlled through legally enforceable and precise noise limits, including at night.</u> Unable to confirm position—ES not yet available</p>	

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.65.1 2	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant mitigation measures specified in Chapter 14 (Noise and Vibration) of the ES [APP-256] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October 2024 to agree on the structure for the Outline CoCP [APP-300].- A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated position (February 2026):</u></p> <p><u>Noted. Further assessments are required and will be undertaken at the appropriate time by the appropriate stakeholder (contractors).</u></p> <p><u>Night-time background sound levels have no bearing on the assessment of construction noise. However, it is acknowledged and agreed that noise levels are generally low in the area, particular away from main transport routes, and this is reflected appropriated in</u></p>	<p><u>Whilst TDC endorsed the methodology set out in the relevant chapter of the ES, a significant number of detailed assessments must be completed before works begin.</u></p> <p><u>For example, the Outline CoCP is not the final document. It requires the Main Works Contractor to:</u></p> <ul style="list-style-type: none"> <u>Carry out detailed construction noise and vibration assessments</u> <u>Identify any location-specific issues (e.g., Little Bromley, Great Bromley, Ardleigh properties near haul roads)</u> <u>Produce a Noise and Vibration Management Plan (NVMP)</u> <u>Apply additional mitigation where significant effects could occur</u> <p><u>This means Tendring-specific risks—particularly the extremely low rural background levels—should be re-assessed with greater precision</u></p>	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>the assessments and will be reflected in the detailed assessments undertaken by the contractor.</u></p> <p><u>It is also agreed that although significant adverse effects are not expected (with the exception potentially of Jasmine Cottage), construction noise will still be audible and some vibration may be perceptible. However, this is a normal and unavoidable consequence of development. The principle is to reduce such effects as far as practicable, and the management principles put in place ensure that this would be the case.</u></p>	<p><u>before works start, leaving affected locals with continued uncertainty.</u></p> <p><u>The final OCoCP should include strong requirements for community liaison.</u></p> <p><u>For a rural area such as this and with low background noise, communication from NGET and contractors will be key and should include requirements such as (list not exhaustive):</u></p> <ul style="list-style-type: none"> <u>• Advance notices of “noisy periods”</u> <u>• A clear, accessible, and user-friendly public complaints process must be established and maintained, ensuring that all information is easy to find, simple to understand, and straightforward for the public to use</u> <u>• Site fencing and screening where feasible</u> <p><u>There are further limitations to mitigation and managing construction impacts for example TDC needs to reinforce that background LA90 levels in the areas between Little Bromley, Ardleigh, Lawford and Great Bromley are as low as 21–25 dB at night.</u></p> <p><u>In such quiet environments, even well-mitigated works can be noticeably intrusive to receptors.</u></p> <p><u>While the ES concludes impacts are “not significant” with mitigation, TDC argues that residual impacts may still be locally disruptive, even if not “significant” under EIA thresholds and</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			additional mitigation will in all likelihood be required. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available	

Other matters as required

3.63.7 Health and Wellbeing

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.76.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 10.2 of Chapter 10 (Health and Wellbeing) of the ES [APP-192].	TDC agrees that all relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment. Latest ES not yet available, cannot state position	Agreed Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.76.2	Study area	The study area was agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024.	No comments received from TDC on the Health and Wellbeing Refreshed Approach – Technical Note to date. It is therefore assumed that the study area is agreed.	Agreed
3.76.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of Chapter 10 (Health and Wellbeing) of the ES [APP-192].	<u>ES presents sufficient and proportionate desktop data for TDC to inform the Health and Wellbeing assessment, however it is entirely desk-based, and there are no site/area specific health surveys, which given the sheer scale of the project and the wide-ranging impacts, could result in a distortion of the understanding of health and wellbeing impacts, it is nevertheless acknowledged that the approach followed is considered acceptable within EIA practice.</u> Latest ES not yet available, cannot state position	Agreed Under Discussion
3.76.4	Assessment methodology	The Methodology was agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024. A meeting was held on 24 September 2024 to agree the assessment methodology of the Health and Wellbeing ES chapter.	TDC comment in relation to this section of the SOCG: This is an inaccurate summary and unevicenced assumption – It is unclear if any TDC officials have been invited to the 24th Sept 2024 meeting,	Under discussion Agreed

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
3.76.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. The key parameters and assumptions presented are considered appropriate.</p> <p>Updated position (February 2026):</p> <p>National Grid's position in relation to consultation and engagement with affected Tendring communities is set out in matters 3.2.7 to 3.2.10 of this SoCG.</p> <p>Baseline data for health and wellbeing has been collated and presented in Appendix 6.10.A1 Environment Statement Appendix 10.1 – Health and Wellbeing Baseline Statistics [APP-193]. This includes data for both physical and mental health and wellbeing that is publicly available at an appropriate geographic level. Data for mental wellbeing indicators is provided at Tendring-wide level for personal well-being data and for hospital stays for self-harm; data relating to self-reported general health (of which mental wellbeing can be component) is reported at ward level for the Ardeigh and Little Bromley, and Lawford, Manningtree and Mistry wards. Baseline data gathered is considered to be appropriate and proportionate to the nature of the Project and study area.</p> <p>We note in response to ID3.7.6 below that TDC agree that the baseline conditions and receptors presented broadly reflect Tendring's demographic and other characteristics.</p>	<p>moreover TDC officials need to see the Health and Wellbeing ES chapter.</p> <p><u>Whilst the key parameter and assumptions presented are considered appropriate, TDC needs to reinforce again that there were no direct engagement surveys from NGET with affected Tendring communities (especially the settled communities in and around Ardeigh and Little Bromley) on health perceptions insofar as this particular NSIP proposal is concerned.</u></p> <p><u>There are also no bespoke mental-health baseline data despite Tendring's known vulnerabilities, this lack of data could again result in a distortion of assumptions. Latest ES not yet available, cannot state position</u></p>	Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Baseline Conditions				
3.76.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. The baseline conditions and receptors presented are considered appropriate.</p>	<p>The baseline conditions and receptors presented and in a TDC context broadly reflect Tendring's known demographic, socio-economic, health and environmental characteristics and appear to accurately capture Tendring's specific vulnerabilities, including deprivation, health inequalities, mental wellbeing indicators, and population structure. Latest ES not yet available, cannot state position</p>	Agreed Under Discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.76.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the specific socioeconomic vulnerabilities within affected Tendring communities, TDC recommends that this issue is fully explored during the examination. In particular, TDC considers that the establishment of a clear and robust Health and Wellbeing Monitoring Framework should be examined. Such a framework should incorporate Tendring specific baseline data on active travel, access to green space, amenity satisfaction, and mental</p>	Under Discussion
		<p>Updated position (February 2026): <u>No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings, where necessary. This would enable</u></p>		

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</u></p>	<p><u>wellbeing; set out clear indicators, reporting intervals, and responsibilities; and be codeveloped with local communities and affected Parish Councils to ensure it is meaningful, locally relevant, and trusted. Latest ES not yet available, cannot state position</u></p>	
3.76.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of Chapter 10 (Health and Wellbeing) of the ES [APP-192] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Updated position (February 2026): <u>See response to ID3.7.7 above in relation to the identification of no significant health and wellbeing effects as they relate to health and wellbeing and the Project's approach to ongoing engagement.</u> <u>See responses to matters relating to the Noise and Vibration assessment, for example ID3.6.8 of this document which refers to standard mitigation.</u></p>	<p><u>The standard mitigation measures as set out are not fully adequate for Tendring's context unless they are strengthened in areas such as:</u></p> <ul style="list-style-type: none"> <u>• Protection of high-sensitivity rural and vulnerable communities;</u> <u>• Management of cumulative amenity effects;</u> <u>• Ensuring ongoing, transparent, locally-specific engagement and monitoring;</u> <u>• Tendring has particular vulnerabilities, including higher deprivation and fuel poverty levels;</u> <u>• Lower life satisfaction and poorer mental health indicators;</u> <u>• High proportions of older and disabled residents; and</u> <u>• Predominantly rural communities with very low baseline noise and high amenity reliance;</u> <p><u>Also, because of the very low rural baseline noise levels in Tendring, even "minor" impacts can feel highly</u></p>	Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>intrusive; standard noise BPM alone may not be enough.</u></p> <p><u>TDC recommends additional commitments such as:</u></p> <ul style="list-style-type: none"> <u>• Targeted health and wellbeing monitoring and not least because of higher baseline vulnerability. Additional targeted psychological wellbeing mitigation beyond just communication.</u> <u>• NGET to address the issue of no specific commitments in addressing communities near Bentley Road which will be subjected to the highest levels of noise, vibration, disturbances and amenity impacts across the entire project.</u> <p><u>NGET to address the absence of no Tendring specific indicators for tracking cumulative amenity stress. Latest ES not yet available, cannot state position</u></p>	
3.76.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 10.6 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated position (February 2026):</u></p>	<p><u>No — the ES does not propose any additional mitigation, and this is not considered adequate for TDC and its affected residents and communities (also see position statement on ID3.6.8 directly above).</u></p> <p><u>Given the scale, duration, and intensity of the construction programme, and</u></p>	<p><u>Not agreed Under Discussion</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>See response to ID3.7.7 above in relation to the lack of significant effects as they relate to health and wellbeing and the Project's approach to ongoing engagement</u></p> <p><u>See responses to matters relating to the Noise and Vibration assessment, for example ID3.6.8 of this document which refers to standard mitigation.</u></p>	<p><u>the well-evidenced socioeconomic and health vulnerabilities within Tendring, the decision in Section 10.6 to identify no additional mitigation is not proportionate and does not fully address the potential health and wellbeing effects identified in the baseline.</u></p> <p><u>Construction impacts in Tendring include some of the most acute along the route, for example, noise and traffic impacts (Chapter 14 of ES) identifies a large magnitude adverse noise impact along Bentley Road (PAR 30), with several receptors experiencing a significant effect before mitigation — and only partial improvement afterwards.</u></p> <p><u>Even after applying BPM, the Health and Wellbeing chapter concludes that only a negligible effect remains, but this is based on population-level significance rather than the lived experience of the most severely affected communities, properties and households such as those living in and around Little Bromley and Ardleigh.</u></p> <p><u>Finally, the ES repeatedly notes that mental health impacts may arise from:</u></p> <ul style="list-style-type: none"> <u>• Changes to visual amenity</u> <u>• Noise and disturbance</u> <u>• Loss of control, uncertainty, and perceptions of EMF risk</u> 	

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			<p><u>Despite this, the applicant proposes no additional mental health focused measures, relying solely on generic communication and complaints procedures.</u> <u>This is not adequate for Tendring, which the baseline identifies as having:</u></p> <ul style="list-style-type: none"> • <u>Persistent mental health inequalities</u> • <u>Lower life satisfaction</u> • <u>Higher stress and anxiety related indicators</u> • <u>Long (4 year) construction period),and</u> <p><u>Little or no mental health monitoring proposed/suggested Latest ES not yet available, cannot state position</u></p>	

EIA – Assessment Conclusions

3.76.1 0	Construction effects	<p>The assessment of effects during construction is presented in Section 10.7 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. The assessment of effects during construction presented is considered appropriate.</p> <p><u>Updated position (February 2026):</u> <u>TDC's comments relate to ward sensitivity and how this has been assessed. A variety of ward-level data has been combined to assign sensitivity for individual wards within the Order Limits along the Project route and this is considered to be appropriate geography and</u></p>	<p><u>In principle, the assessment of construction phase effects in Section 10.7 is appropriate at a strategic, EIA level for Tendring District. Whilst the assessment adopts a policy compliant methodology, it does not adequately reflect the localised, cumulative and prolonged adverse effects that will be experienced by specific communities within Tendring, particularly in Ardleigh and Little Bromley and along key primary access routes, around the EACN and along and close to the</u></p>	Under Discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>proportionate approach for a Project of this scale and nature (i.e. a long, linear route). The methodology also considers impacts on both the general population and draws out where particular impacts may be more relevant to vulnerable population groups, such as children or older people. It is important to note that Chapter 10 Health and Wellbeing [APP-192] presents a population-level assessment rather than identifying impacts explicitly on individuals; this approach is referenced in paragraph 10.4.28 of the chapter and explained where relevant throughout the chapter in relation to specific assessments (for example in relation to impacts on access to work and training in paragraph 10.7.80). The Chapter does however acknowledge that there are instances where individuals may experience different degrees of impact (for example in relation to visual amenity where some individuals may experience heightened levels of stress or anxiety than others for various reasons).</u></p> <p><u>Impacts associated with visual change have been considered in relation to health and wellbeing for both the construction and operational phase of the Project, noting that visual amenity plays a crucial role in shaping individuals' perceptions of their surroundings, influencing mental wellbeing, stress levels, and overall quality of life. Chapter 10 Health and Wellbeing [APP-192] notes that residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore where effects are of a more permanent duration) may be more vulnerable to change, particularly during the short-term and are therefore identified as being of high sensitivity. It is also noted that impacts are likely to be experienced differentially by members of</u></p>	<p><u>cable corridor and the pylons arch around the north of Ardleigh and back (respectively). The over reliance on ward level sensitivity masks the intensity of impacts at settlement and receptor level, and the assessment underestimates the mental health and wellbeing effects associated with sustained (in-combination) construction activity, traffic intrusion, visual change and (what a very significant percentage of affected local communities will see as a) loss of control over one's local environment, the settlement where you live and the place you call home.</u></p> <p><u>This ES chapter conveniently uses 'low ward-level sensitivity' as an average measure of demographic vulnerability across a whole ward. Insofar as the Health and Wellbeing assessment is concerned, it does not reflect who/which areas/sub-wards/sub-communities are severely exposed to construction impacts, how often, or how intensely. In the most severely affected part of Tendring, particularly Ardleigh and Little Bromley, the ES uses a low ward-level sensitivity classification to downplay health effects across the board, and even where impacts are concentrated on specific roads where many</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>local communities according to factors such as where they live, or their outlook. Finally, the chapter does note that, there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operational phase of the Project.</u></p> <p><u>A Residential Visual Amenity Assessment (RVAA) has been prepared as an appendix to Chapter 13 (6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Part 1 of 2 [APP-233 and APP-234]). This finds no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live.</u></p> <p><u>In relation to construction impacts, whilst it is understood that these may impact communities for varying durations depending on location and nature of activity, a suite of mitigation measures (e.g. in relation to noise, air quality and traffic and transport) are set out in the Outline Code of Construction Practice [APP-300] and Outline Construction Traffic Management Plan [APP-309].</u></p> <p><u>In relation to points made regarding the dominance of the proposed infrastructure being wholly out of proportion to the size, character and resilience of the communities affected, these matters are covered in relation to the siting selection process for the Project [ID3.2.5 of this document].</u></p> <p><u>Points relating to consultation and engagement with residents and stakeholders are covered in our response to ID3.2.7 to 3.2.10 of this document.</u></p>	<p><u>residents will experience continuous disruption for several years.</u></p> <p><u>In the context of the Health and Wellbeing assessment, the ES relies on a low ward-level sensitivity classification as an <i>averaged measure of demographic vulnerability</i> across an entire ward. However, this approach is fundamentally inadequate in the circumstances of this project and results in a systematic under-assessment of health and wellbeing impacts on the communities most directly affected. It also fails to engage with the cumulative aspect and the uncertainty introduced for the residents of the most severely affected communities in respect of 'what will follow... (see Cumulative Impacts)'</u></p> <p><u>While the ES applies ward-level sensitivity as a proxy for population vulnerability, it fails to engage in any meaningful or holistic assessment of exposure, particularly in relation to the disproportionate concentration of electricity infrastructure within relatively small rural communities. This includes the cumulative health and wellbeing effects of permanent and temporary haul routes, construction traffic, pylon installation, trenching works, land severance, and prolonged</u></p>	

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		<p><u>Finally, in relation to cumulative impacts, ES Chapter 17 Cumulative Effects [APP-281] contains an assessment of inter- and intra-project cumulative effects. For health and wellbeing, the chapter notes that, although no significant effects on health and wellbeing have been identified in relation to the relationship between the Project and other developments (inter-project effects), adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.</u></p>	<p><u>disturbance to agricultural land that underpins the local rural economy.</u></p> <p><u>In areas such as Ardleigh and Little Bromley, the scale, permanence and physical dominance of the proposed infrastructure is wholly out of proportion to the size, character and resilience of the communities affected.</u></p> <p><u>The project will introduce a fundamental and permanent transformation of landscape, land use and sense of place, yet the Health and Wellbeing assessment does not grapple with the psychological and community level consequences of this change, including stress, anxiety, loss of control, and reduced wellbeing arising from sustained proximity to largescale infrastructure.</u></p> <p><u>Crucially, the ES uses a low ward level sensitivity designation to discount impacts, despite acknowledging significant and concentrated effects elsewhere in the ES at receptor level in these high impact areas (for example in relation to construction traffic noise, visual effects and access disruption for Ardleigh and Little Bromley and surrounding areas). This represents a methodological flaw,</u></p>	

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			<p><u>whereby averaged demographic data is inappropriately relied upon to downplay severe impacts that are in highly localised and disproportionately affecting communities such as Ardleigh and Little Bromley, if this DCO goes ahead these impacts will be unavoidable and experienced repeatedly by the same households and communities over a prolonged construction period, especially when the cumulative effects are taking into account.</u></p> <p><u>The assessment therefore prioritises statistical abstraction over lived experience, in fact, the assessment shows no interest whatsoever to engage at human level lived experience. It does not reflect the reality that a ward assessed as having "low sensitivity" on average may nonetheless contain communities that are acutely sensitive due to sustained exposure, limited capacity to adapt or react, rural isolation, and dependence on a small number of transport routes and land-based economic activities.</u></p> <p><u>As a result, and until these gaps in the assessment are addressed, the ES conveniently and unjustifiably downplays the health and wellbeing impacts on the most severely affected</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
3.76.1 1	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 10.7 of Chapter 10 (Health and Wellbeing) of the ES [APP-192]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Updated position (February 2026): <u>TDCs comments relating to visual amenity have been referenced in response to ID3.7.10 above.</u></p> <p>Chapter 10 – Health and Wellbeing [APP-192] <u>includes an assessment of impacts on mental health and wellbeing during the construction period, which considers the level of control people feel they have over their physical environment; findings from consultation have highlighted the stress and anxiety experienced by people as a result of potential impacts of the Project on their local area (notably visual impacts).</u></p> <p><u>Impacts experienced by recreational users are assessed in Chapter 15 – Socio-economics, Recreation and Tourism [APP-265].</u></p> <p><u>As highlighted in relation to earlier responses, the Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside the development consent process, since it is not a material consideration in the</u></p>	<p><u>communities. This approach is not consistent with a proportionate or precautionary assessment of health effects and does not provide the ExA with a sound basis on which to understand the true scale of harm likely to arise during construction and thereafter. Latest ES not yet available, cannot state position</u></p> <p><u>The ES identifies significant adverse effects on landscape character during operation and maintenance within the draft Order Limits in Tendring and the surrounding area, extending approximately 0.5–1 km from the project. Significant adverse effects on views and visual amenity are also predicted during operation and maintenance, extending approximately 1–2 km from the project. The ES argues that these effects are likely to be experienced by residents, road users, and recreational users living in these impact zones or using this area.</u></p> <p><u>The ES acknowledges that responses to visual and landscape impacts are subjective and that a proportion of the local population may be affected due to changes to the setting of homes, businesses, and culturally or ecologically important community assets. Further assessment presented</u></p>	Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).</u></p>	<p><u>in the ES should also draw on the qualitative mental health and wellbeing approach set out 3.3.10 above and in the refreshed Health and Wellbeing Assessment Technical Note.</u></p> <p><u>During statutory consultation, Tendring District Council highlighted the need to offset significant adverse impacts through meaningful, deliverable community benefits for affected communities. This could include support for community energy schemes, local training and skills investment, and targeted measures in areas of higher deprivation. At present, limited proposals have been put forward by NGET, and TDC and ECC will continue discussions to better understand the scope of any community benefit offer.</u></p> <p><u>There is also an opportunity to secure accessible green spaces that support health and wellbeing while enhancing biodiversity and local nature recovery. Latest ES not yet available, cannot state position</u></p>	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.76.1 2	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant mitigation measures specified in Chapter 10 (Health and Wellbeing) of the ES [APP-192] and is appropriate for managing construction impacts from the Project.</p>	<p><u>See comments under 3.7.8 and 3.7.9 above.</u></p> <p><u>In addition, Table 5.1 of the Outline CoCP should include a specific section covering health and wellbeing</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>Meeting held in October 2024 to agree on the structure for the Outline CoCP [APP-300].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated position (February 2026):</u></p> <p><u>TDC makes reference to Section 5.1.11 and Table 5.1 of the Outline CoCP [APP-300], however this section and relevant table do not contain any specific health and wellbeing mitigation measures. It is suggested that the correct reference is to Table 6.1; whilst paragraph 6.1.12 of the Outline CoCP [APP-300] states there are specific health and wellbeing mitigation measures included in the table, this is not, in fact, the case. Clarification is sought as to the exact nature of TDC's comment in this regard.</u></p>	<p><u>management during both the construction and operational phases, in line with the refreshed health and wellbeing assessment approach. Although this requirement is referenced in Section 5.1.11 of the Outline CoCP, it is not currently reflected as a dedicated management section within Table 5.1. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</u></p>	

Other matters as required

3.73.8 Historic Environment

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	<u>Policy and legislation (Archaeology)</u>	<p><u>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 11.2 of Chapter 11 (Historic Environment) of the ES [APP-208].</u></p> <p><u>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	<p><u>The ES Chapter 11.2 contain all relevant legislation, policy and guidance.</u></p>	Agreed
3.8.27.4	<u>Policy and legislation (Built Heritage)</u>	<p><u>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 11.2 of Chapter 11 (Historic Environment) of the ES [APP-208].</u></p> <p><u>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p> <p><u>Updated position (February 2026):</u></p> <p><u>National Grid notes the LPA's request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with the Scoping Report (6.19 Scoping Report [APP-288 – APP-296]), Scoping Opinion (6.20 Scoping Opinion [APP-297]) and the methodology set out in Chapter 11: Historic</u></p>	<p><u>TDC (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209] we are able to agree this matter. Latest ES not yet available, cannot confirm position</u></p>	Agreed Under Discussion

Environment of the ES (6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]). Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The Applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.

EIA – Approach and Methods

<p>3.8.37. Study area 2</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	<p>Agreed</p>
<p>3.8.47. Data sources 3 (Built Heritage)</p>	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section</p>	<p><u>There has been sufficient desktop data collected; however the fieldwork proposed prior to application has not</u></p>	<p>Under discussion Agreed</p>

11.4 of Chapter 11 (Historic Environment) of the ES [APP-208].

Updated position (February 2026):

Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The Historic Environment Baseline Report (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]) is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.

been completed and the impact of this to inform the assessment is under review.

TDC (EPS need an updated status on accuracy of AP rectification. Information recently provided by Place Services includes Palaeolithic potential to be included in Palaeolithic/geoarchaeology background.

See 3.7.4 re: Non-Designated Heritage Assets (NDHAs) (EPS—Built Heritage) confirm that this matter is agreed., May 2025)

3.8.5 Data sources (archaeology) - Desktop

Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208].

TDC (Archaeology) has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026).

Agreed

3.8.6 Data sources (archaeology) – survey data

Sufficient survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208]. As of January 2026, when the Supplementary Environmental Information was submitted to the Planning Inspectorate, approximately 3000 trial trenches and 1440 ha of geophysical survey had been

TDC (Archaeology) notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. This matter remains under discussion.

Under discussion

completed. The phase 2 stage of the geophysical survey and trial trenching will continue in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 **Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP328].** The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application.

National Grid will continue to engage with TDC (Archaeology) on this matter.

3.8.7.4 Assessment methodology (Built Heritage)

The Scoping Opinion stated: “*The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.*”

The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024.

Our assessment has carefully considered both designated and non-designated heritage assets, ensuring that their setting and significance are appropriately evaluated. As part of the ongoing process, we will further review and update the information in line with relevant guidelines, addressing any remaining uncertainties. The updated assessments will be included in the Environmental Statement for the DCO submission.

~~Methodology not agreed. The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and all October 2024.~~

~~TDC raised at statutory consultation that there was limited recognition of and insufficient information on nearby designated and non-designated heritage assets affected not and uncertainty around the impact of the development on their setting and significance [within the PEIR, National Grid April 2024]. Certain non-designated assets that appear on the Historic Environment Record have been~~

Under discussion

Historic Environment Viewpoints feedback will be taken into account for the assessment.

National Grid position regarding non-designated heritage assets is as outlined in section 3.8.2 (Policy and Legislation) above.

~~described as 'low value' which TDC suggests needs reassessing.~~

~~Historic Environment Viewpoints feedback received on 3rd March 2025 from EPS.~~

~~EPS: With regard to the non-designated heritage assets a programme of geophysics and trial trenching is underway within the undergrounding sections of the route, however it would be expected that a programme of archaeological investigation will have occurred in advance of the submission of the application in areas disturbed by the overhead proposals, including the access route, so that the impact on heritage assets is understood in these areas also. (May 2025)~~

~~It appears that the only NDHAs included in Annex A are those that appear on the relevant Historic Environment Record. This is concerning as not all built NDHAs will be included on the HER. Unfortunately, no text has been provided which addresses various comments and questions previously raised regarding whether there was a methodology for identifying NDHAs as part of site walkovers, whether this has been undertaken, or whether any have been identified (see ECC /TDC LIR for more details).-~~

~~As such, there are still concerns that not all NDHAs have been included (Built Heritage, May 2025)~~

			A 'spot check' of the Draft Heritage Baseline Report was carried out by Place Services which raised questions and concerns regarding the robustness of the methodology. These comments were submitted to NG in a letter dated 6th March 2025 (Built Heritage, May 2025)	
<u>3.8.8</u>	<u>Assessment methodology (Archaeology)</u>	<u>The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</u>	<u>TDC is in agreement with this matter.</u>	<u>Agreed</u>
<u>3.8.97-7</u>	Key parameters and assumptions	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES. The key parameters and assumptions presented are considered appropriate. In March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.	<u>TDC (Built Heritage) is in agreement with the matter following review of the ES. Latest ES not yet available, cannot confirm position</u>	Under discussion <u>Agreed</u>
<u>3.8.10</u>	<u>Key parameters and assumptions (Archaeology)</u>	<u>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208]. The key parameters and assumptions presented are considered appropriate. February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic. March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information and will continue to engage with TDC on this matter.</u>	<u>TDC (Archaeology) is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains."</u>	<u>Under discussion</u>

See NG position for 3.8.6 regarding archaeological evaluation.

EIA – Baseline Conditions

<p><u>3.7.8.1</u> Baseline conditions and receptors (<u>Built heritage</u>)</p>	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]. The baseline conditions and receptors presented are considered appropriate.</p> <p><u>Further detail relevant to this section are outlined in section 3.8.4 (Data Sources).</u></p> <p>TDC/EPS comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p><u>TDC (Built Heritage) is in agreement with this matter.</u></p> <p><u>Latest ES not yet available, cannot confirm position.</u></p> <p><u>EPS: A 'spot check' of the Draft Heritage Baseline Report was carried out by Place Services which raised questions and concerns regarding the robustness of the methodology. These comments were submitted to NG in a letter dated 6th March 2025 (Built Heritage, May 2025)</u></p>	<p><u>Under discussion</u> <u>Agreed</u></p>
<p><u>3.8.12</u> <u>Baseline conditions and receptors (Archaeology)</u></p>	<p><u>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]. The baseline conditions and receptors presented are considered appropriate.</u></p> <p><u>February 2025, National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</u></p>	<p><u>TDC (Archaeology) agreed this matter during call in January 2026.</u></p>	<p><u>Agreed</u></p>

EIA – Embedded, Standard and Additional Mitigation Measures

<p><u>3.8.13</u> Embedded mitigation</p>	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>TDC agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is most relevant in areas of</u></p>	<p><u>Under discussion</u></p>
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	<p><u>Matter remains Under discussion for archaeology. National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>underground cable where there will be an impact on archaeological remains. Latest ES not yet available, cannot confirm position</u></p>	
<p>3.8.14 7.40 Standard mitigation (<u>Built heritage</u>)</p>	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208] and set out in the Outline CoCP [APP-300 document reference X.X]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Updated position (February 2026):</p> <p><u>Regarding commitment H06 the term ‘appropriate’ in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [AS-046]. Specifically, this means:</u></p> <p><u>Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature</u></p> <p><u>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists</u></p> <p><u>Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible</u></p>	<p><u>This matter is agreed with regards to commitment H06.</u></p> <p><u>Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) we would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects. Latest ES not yet available, cannot confirm position</u></p>	<p>Under discussion</p>

		<p><u>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.</u></p> <p><u>Regarding H07 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate. National Grid will continue to engage with TDC on this matter.</u></p>		
3.8.15	Standard mitigation (Archaeology)	<p><u>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208] and set out in the Outline CoCP [APP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p>	<p><u>Aligned with ECC (Archaeology) TDC also considers further actions are required within the OCEMP to ensure potential effects are considered. This will be expanded upon in the forthcoming Local Impact report.</u></p> <p><u>TDC (Archaeology) agreed this matter during call held January 2026.</u></p>	Agreed
3.8.16 7.14	Additional mitigation	<p><u>The consideration of additional mitigation measures are presented in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Matter will remain Under discussion for archaeology until the outline AMS WSI is finalised.</u></p>	<p><u>The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation.</u></p> <p><u>TDC noted during call in January 2026 that this matter is not relevant for Built Heritage. Latest ES not yet available, cannot confirm position</u></p>	Under discussion

EIA – Assessment Conclusions

<p>3.8.17 7.12</p> <p>Construction effects</p>	<p>The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [APP-208]. The assessment of effects during construction presented is considered appropriate.</p>	<p><u>TDC (Built Heritage) are in agreement with this matter.</u></p> <p><u>Following review of the ES, TDC (Archaeology) confirmed agreement on this matter during call in January 2026. Latest ES not yet available, cannot confirm position</u></p>	<p><u>Under discussion</u> <u>Agreed</u></p>
<p>3.8.18 7.13</p> <p>Operational (and maintenance) effects</p>	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [APP-208]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p><u>TDC (Built Heritage) are in agreement with this matter.</u></p> <p><u>Following review of the ES, TDC (Archaeology) confirmed agreement on this matter during call in January 2026. Latest ES not yet available, cannot confirm position</u></p>	<p><u>Agreed</u> <u>Under discussion</u></p>

Draft DCO / Outline Management Plans / Mitigation and Monitoring

<p>3.8.19 7.14</p> <p>Outline CoCP</p>	<p>The Outline CoCP [APP-300] includes all relevant construction mitigation measures specified in Chapter 11 (Historic Environment) of the ES [APP-208] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p><u>Concern that the Outline CoCP does not acknowledge the potential impacts to built heritage during the construction phase (also see section 3.8.17 above) and makes reference only to the how the project may affect the historic environment through disturbing known and unknown archaeology and the removal of historic landscape features.</u></p> <p><u>This section is currently under review (TDC Archaeology). Further comments will be included within the LIR which require action.</u></p> <p><u>For TDC (Built Heritage) See 3.8.14 Standard mitigation (Built Heritage) for current position. Comments have been</u></p>	<p><u>Under discussion</u></p>
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		<p>Updated position (February 2026): <u>See 3.8.14 and 3.8.15 for current position.</u> <u>Further discussions will take place following National Grid’s review of TDC’s Local Impact Report (LIR).</u> <u>National Grid will continue to engage with TDC on this matter.</u></p>	<p>submitted to National Grid and this is still under discussion. The structure of the CoCP is agreed but the contents are not. Comments were provided to NG in a letter dated 24th February 2025 (EPS – Built Heritage, May 2025).</p>	
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Other matters as required

3.8.20 7.15	<p><u>Overarching Written Scheme of Investigation Investigations</u> (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.</p>	<p><u>National Grid shared overarching WSIs in March – June 2024 and December 2024.</u> <u>The scope and methodology of the overarching WSI WSIs for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</u> This would include defining priority areas on the basis of potential impact from construction works to focus the geophysical survey and trial trenching approach and inform the programme for these works.</p>	<p><u>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</u> EPS – Response unavailable</p>	<p><u>Agreed Under discussion</u></p>
3.8.21	<p><u>Site specific Written Schemes of Investigation</u> (WSIs) for pre-consent archaeological trial trenching.</p>	<p><u>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</u> There are still addenda to site specific WSIs forthcoming that have yet to be issued.</p>	<p><u>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</u></p>	<p><u>Agreed</u></p>
3.8.22 7.16	<p><u>Outline Archaeological Draft Mitigation</u></p>	<p><u>The contents of the Outline Archaeological Draft Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</u></p>	<p><u>The Outline AMS-WSI is currently not agreed, further comments will be provided in TDC’s Local Impact report (with input from ECC Archaeology) EPS response: The first draft of the</u></p>	<p><u>Under discussion</u></p>

Strategy and Outline WSI	National Grid issued the Draft Outline Mitigation Strategy and draft Outline AMS-OWSI <u>Written Scheme of Investigation (WSI)</u> for <u>the</u> post-consent stage of the project in April 2025.	mitigation strategy and OWSI was submitted in Late April with comments provided in May. In general, the structure is fine, however, a lot more detail is still required. One major omission was the lack of outreach identified in the document.	
3.8.23 7.17 Programme for completion of archaeological fieldwork	<p><u>A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</u></p> <p><u>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</u></p> <p><u>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</u></p>	<p><u>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</u> Unknown — need to see EPS position</p>	<p><u>Agreed</u> Und <u>er</u> <u>discussion</u></p>

3.83.9 Landscape and Visual

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.98.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 13.2 Chapter 13 (Landscape and Visual) of the ES [APP-226].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Updated position (February 2026): Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid/TDC/EPs comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p><u>TDC agree with the overarching policy documents stated in the PEIR but would wish Latest ES not yet available, cannot confirm position.</u></p> <p><u>EPS response:</u></p> <p><u>Reference is also needed to also see reference and further action the DEFRA guidance note (2024) in relation to NPS the enhanced duty for National Landscapes under LURA (2023). Likely material.</u></p> <p><u>https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes</u></p> <p><u>Add reference to Overarching National Policy Statement for Energy (EN-1, Section 4 Assessment,) Para 4.1.5 Weighing Impacts 3.4 in relation to compensation for significant negative impacts 'To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and Benefits:</u></p>	Under Discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>'In considering any proposed economic effects of the development the Secretary of State should take into account... its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate how any likely significant negative effects would be avoided, reduced, mitigated or compensate for any adverse impacts compensated for, following the mitigation hierarchy'</u></p> <p><u>In previous correspondence including TDCs Statutory Consultation response and Relevant Representations, a significant number of localised Landscape and Visual Impacts and Issues have been identified. Local landscape designation no longer forms part of promoted government policy and therefore local value generally needs to be assessed in line with 'TGN 02-21: Assessing landscape value outside national designations'</u></p> <p><u>Whilst valued landscape criteria have now been included in the landscape assessment, like ECC, TDC is also concerned that some of the evaluation is flawed (details will following in TDC LIR). In addition, as the baseline</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly (and in a TDC context) severely affected, particularly open landscapes that are so prevalent in the areas between Ardleigh and Little Bromley, but also National Landscape fringe areas. TDC also had concerns regarding whether a preliminary judgement on significance had been determined without going through the stage of identifying susceptibility and magnitude of effects. TDC are content that all stages of the LVIA process have been executed although not necessarily with all aspects of the approach.</u></p>	

EIA – Approach and Methods

3.98.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops. <u>TDC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding.</u></p>	Agreed
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ID	Matter	National Grid's Position	Tending District Council's Position	Status
3.98.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 13.4 of Chapter 13 (Landscape and Visual) of the ES [APP-226].</p> <p>Updated position (February 2026): Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid TDC/EPs comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p><u>TDC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, TDC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance.</u></p> <p>TDC and EPs remain unsatisfied with the number of viewpoint assessments proposed generally (Email November 2024).</p> <p>Whilst all agreed we welcome the inclusion of criteria (on against which assessment judgements are based) have now been identified and presented in the ES, TDC retain issue with the landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value and value of the view.</p> <p><u>In our forthcoming LIR TDC will identify several additional areas where we believe data quality and presentation could be improved in order to aid access and interpretation. assessment (Email 22.04.2025)</u></p>	Under discussion
3.98.4	Assessment methodology (including LVIA)	The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning	<ul style="list-style-type: none"> <u>In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, TDC agrees</u> 	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
	methodology and viewpoints)	<p>Inspectorate and through subsequent thematic workshops</p> <p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28th November 2024 to follow up any additional changes to the assessment.</p> <p>Viewpoints are still under discussion.</p> <p>National Grid issued an update on LVIA Viewpoints and Methodology in March 2025.</p> <p><u>Updated position (February 2026):</u></p> <p><u>Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid TDC/EPs comments are noted, and NG will continue to engage with TDC on this matter.</u></p>	<p><u>with ECC and retain concerns in a select individual areas where there remain gaps in the coverage – more detail will be provided in TDCs LIR.</u></p> <ul style="list-style-type: none"> <u>In relation to valued landscapes see comments at 3.9.1 and 3.9.3 above.</u> <u>TDC strongly support ECC's position and also retain concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 'Outside nationally designated areas, there are local landscapes that may be highly valued locally' nor how the following in the current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: '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.'</u> This issue is highly relevant to the valued landscapes surrounding Ardleigh and Little Bromley, including the National Landscape areas and fringe areas immediately to the north, north west and north east of Ardleigh and Little Bromley. These landscapes would experience significant impacts as a 	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>result of NGET's preferred route and the proposed EACN location.</u></p> <p>The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops</p> <p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28th November 2024 to follow up any additional changes to the assessment.</p> <p>Viewpoints are still under discussion.</p> <p>EPS response:</p> <p>EPS Email response to proposed viewpoints in Essex North dated 24th October 2024.</p> <p>TDC remain unsatisfied generally with the number of viewpoint assessments proposed.</p> <p>Whilst TDC welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025)</p> <p>TDC also have reservations regarding the methodology for assessing the value of views as this appears skewed towards promotional data.</p>	

ID	Matter	National Grid's Position	Tending District Council's Position	Status
3.98.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The key parameters and assumptions presented are considered appropriate.</p> <p>Updated position (February 2026): National Grid notes this comment TDC/EPSC comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>ES not yet available and TDC not sure what is meant by reserve the terms right to comment further should the parameters and assumptions change.</p> <p>EPS response: The preliminary key parameters and assumptions are presented at 13.5 in relation to LVIA. It is understood 'This information is iterative and will be updated for the ES as the design evolves and relevant changes are accounted for in the assessment'. TDC reserve the right to comment further should the parameters and assumptions change.</p>	Under Discussion

EIA – Baseline Conditions

3.98.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The baseline conditions and receptors presented are considered appropriate.</p> <p>Updated position (February 2026): National Grid notes this comment TDC/EPSC comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>TDC identified concerns with the Visual Receptors and Groupings that are based only partially on shared landscape characteristics and a similarity in views. TDC also 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. TDC retain these concerns. Final ES not yet available and therefore not possible to pass a position – also echo position set out by EPS.</p> <p>EPS response: An approach to compensation is needed, not just mitigation, e.g. where</p>	Under Discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p>and how it has been identified and described, how the applicant has sought engagement from the local authority on this issue etc.</p> <p>TDC do not consider the applicants have considered or met either the EIA Regs or National Policy Statement EN-1 requirements in relation to compensation. The likely significant negative landscape and visual effects of the project appear not to be compensated for, over and above offering enhancements at substations and sealing end compounds. We suggest the test of 'as far as possible' has not been met in any reasonable way in relation to the overwhelming likely permanent negative landscape and visual impacts along the length of the project described by the applicant within the PEIR.</p> <p>TDC have been calling for engagement on this issue since 2023.</p>	

EIA – Embedded, Standard and Additional Mitigation Measures

3.98.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>In terms of Landscape: TDC retain concerns around adequacy of undergrounding, mitigation and lack of adequate compensation.</u></p> <p><u>TDC acknowledges the embedded and standard mitigation measures proposed. However, these measures</u></p>	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>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 National 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.</p> <p>Additionally, there are various locations (for example the crossing of Ardleigh reservoir and at the Wick Lane and Old Ipswich Road junction) where the adoption of underground cable would present substantial technical challenges that may not be possible to address without further increased effects. It is therefore considered that the use of 400 kV overhead line is still the most appropriate connection technology in this area.</p>	<p><u>are not adequate and significant residual impacts remain, particularly the rural landscape areas in and around Ardleigh (to the north west, north and north east of Ardleigh), the vast area between Ardleigh and Little Bromley, and particularly severely affected areas to the west of Little Bromley.</u> TDC raised at statutory consultation that the undergrounding through the National Landscape fails to address the concerns of the residents of Ardleigh (shared by TDC) about large scale intrusive physical infrastructure running past their community. If the development is to proceed, the Council continues to argue for the section from the EACN onward toward Colchester also being undergrounded — a relatively short stretch of the powerline in the context of its overall length and scale.</p> <p>EPS: The interim LVIA in the PEIR (2024) demonstrates the widespread significant impacts at an operational stage of the EACN and the overhead lines close to Ardleigh. TB001-TB010 parallel the undergrounded cable that connects From North of the National Landscape to the EACN.</p> <p>VP3.11 and VP12 visualisations demonstrate the likely significant impact of the OH lines and EACN south of the project line. More importantly visualisations show that the operational</p>	

ID	Matter	National Grid's Position	Tending District Council's Position	Status
			<p>impacts remain significant from VP3.15 and 3.19, on the edge of the Dedham Vale National Landscape (NL), on either the NL itself or its setting, thus undermining the reason for the undergrounding of the line from north of the NL to the EAGN.</p> <p>These visualisations do not show cumulative effects, notably close to Ardleigh itself where North Falls, Five Estuaries and the likely Tarchon proposals will impact.</p> <p>The viewpoint assessments from the National Landscape are also approx. 2 km apart so the visual impact between these points is unknown.</p>	
3.98.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES [APP-226] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid notes this commentTDC/EPSComments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>EPSComments:</p> <p>Standard mitigation measures do not wholly mitigate substantial significant temporary impacts caused by construction.</p> <p>Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed. Final ES not yet available and therefore not possible to pass a position – TDC also echo position set out by EPS.</p>	Under discussion
3.98.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. Additional mitigation</p>	<p>EPSComments:</p> <p>Additional mitigation measures do not address significant residual negative</p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid notes this comment TDC/EPs comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>impacts from pylons and the overhead cables. We do not agree that the mitigation hierarchy has been effectively applied as it does not include compensation for the significant residual negative impacts of the overhead lines and pylons.</p> <p>An approach to compensation is required, where and how it will be identified and described, and how the applicant will engage on this topic with the local authority. We do not consider the applicants have considered or met either the EIA Regs or EN-1 requirements in relation to compensation. It appears the likely significant negative landscape and visual effects of the project are generally not to be compensated for which is not acceptable.</p> <p>We suggest the test of 'as far as possible' has not been met in any reasonable way in relation to the likely residual significant permanent negative landscape and visual impacts along the length of the project described by the applicant within the PEIR.</p> <p>Final ES not yet available and therefore not possible to pass a position—TDC also echo position set out by Place Services.</p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Assessment Conclusions				
3.98.1 0	Construction effects	<p>The assessment of effects during construction is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The assessment of effects during construction presented is considered appropriate.</p> <p>Updated position (February 2026): Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid/TDC/EPS comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>Potential tree and hedgerow loss along <u>EPS commented that Statutory Consultation response for Tendring District Council (2024) identified:</u></p> <p>Several instances where we judge the route has not been meaningfully or accurate quantified in extent of significant impacts on landscape character and receptors would be more widespread than identified in the PEIR. Impacts on landscape of Colne Valley landscape including Open Access Land and Essex Way understated. Project line needs undergrounding or realigning</p> <p>In relation to visual terms in the assessment (more impact, TDC understand that the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail and clarification will be forthcoming in TDCs LIR), may have been lost as a result.</p> <p>Suggested changes to siting, alignment, viewpoint assessments and visualisations have not necessarily been addressed.</p>	Under discussion
3.98.1 1	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>To further reduce <u>EPS commented that Statutory Consultation response for Tendring District Council (2024) identified:</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>National Grid notes this comment</u>TDC/EPs comments are noted, and NG will continue to engage with TDC on this matter.</p>	<p>Several instances where we judge the extent of significant impacts on landscape character and visual effects at receptors would be more widespread than identified in the operational stage, greater use PEIR.</p> <p>Impacts on landscape of Colne Valley landscape including Open Access Land and Essex Way understated. Project line needs undergrounding or <u>route refinement is required, particularly within river valleys and where pylons</u> realigning</p> <p>In relation to visual impact, TDC understand that the Visual Receptor Areas are close to historic settlements such as Arleigh, and to protect valued local landscapes, long distance public rights of a pragmatic way, and rural amenity areas of organising the data, but fear clarity and detail may have been lost as a result.</p> <p><u>TDC has also noted that the PEIR acknowledges significant adverse landscape and visual effects during both the construction and operational phases across the length of the Project. However, no substantive proposals have been presented to offset or compensate for these impacts. As a result, these issues remain largely unaddressed.</u></p>	

ID	Matter	National Grid's Position	Tending District Council's Position	Status
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			<p><u>While the ES now sets out assessment criteria, including sensitivity (susceptibility and value) and magnitude of effect, TDC retains concerns regarding how some of these criteria are defined and applied. Visual Receptor Areas B4, B5 and B6 do not appear to be labelled on Figure 13.7 Pages 3 or 4.</u></p> <p><u>Suggested changes to siting, alignment, viewpoint assessments and visualisations have not necessarily been addressed.</u></p>	
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Draft DCO / Outline Management Plans / Mitigation and Monitoring				
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3.98.1 2	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES [APP-226] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October 2024 to agree on the structure for the Outline CoCP [APP-300]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p>	<p><u>A significant number of outstanding issues remain which are to be discussed and will be set out in TDCs LIR. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</u></p>	Under discussion

ID	Matter	National Grid's Position	Tending District Council's Position	Status
		<p><u>Updated position (February 2026):</u> <u>Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid will continue to engage with TDC on this matter.</u></p>		
3.9.1 3	Outline LEMP	<p>The <u>Outline LEMP [AS-046]</u> includes all relevant operational related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES <u>[APP-2261]</u> and is appropriate.</p> <p>Meeting held on 9th October to agree on the structure for the Outline LEMP <u>[AS-046]</u>. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP <u>[AS-046]</u>.</p> <p>A further iteration of the Outline LEMP <u>[AS-046]</u> was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>National Grid notes the comments and will continue to engage with TDC on this matter.</u></p> <p><u>National Grid has provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</u></p>	<p><u>TDC echo ECCs concerns and also retain major issues particularly in relation to definition, scope and scale of term 'compensation'.</u></p> <p>TDC is currently engaging with the latest Outline LEMP and will be providing comments in due course. Latest ES not yet available, cannot confirm position.</p>	Under discussion
Other matters as required				
3.9.14	<u>Cumulative Effects</u>	<u>Please see comments at ID3.11.5.</u>	<u>Concern regarding potential cumulative adverse landscape and visual effects, both at construction and long-term operational, particularly in relation to other NSIP projects such as North Falls</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<u>and Five Estuaries substations and the Tarchon Interconnector.</u>	

3.93.10 Socio-economics, Recreation and Tourism

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
<u>3.10.1</u>	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socioeconomics, Recreation and Tourism assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 15.2 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265].	<u>Agreed that all the relevant policy context, legislation and guidance have been included. Latest ES not yet available, cannot confirm position</u>	<u>Agreed Under discussion</u>
EIA – Approach and Methods				
<u>3.10.2</u>	Study area	<p>The Scoping Opinion stated “<i>The Applicant should seek to agree the study area with the relevant local authorities</i>”.</p> <p>A meeting was held on 12 September 2024 to seek to agree this point in the Scoping Opinion.</p> <p>During the Thematic Group meeting in November 2024, it was agreed that the study area for businesses would be increased from 1km to 3km to account for visual effects on businesses.</p> <p><u>The A 3rd Technical Note was issued to TDC in March 2025 is currently being prepared to seek agreement on to agree</u> the study area and methodology.</p>	<u>In principle, TDC considers the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However it is unclear whether specific businesses that fall outside the defined study area but are likely to experience adverse effects—such as wedding and wellness venues, hotels, or other ‘quiet countryside’ tourism uses (list not exhaustive)—have been identified and assessed on a case-by-case basis – more information around this will be set</u>	<u>Agreed Under discussion</u>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Updated position (February 2026):</u> <u>Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity.</u></p>	<p><u>out in TDC's LIR. Latest ES not yet available, cannot confirm position</u></p>	
3.10.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265].</p> <p><u>Updated position (February 2026):</u> <u>The potential number of construction local employment is set out in the Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265], paragraphs 15.7.13 to 15.7.14.</u> <u>Post construction job opportunities are limited given the nature of the development however we will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. With regards to a delivery mechanism, the above measures will be delivered as part of our community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order</u></p>	<p><u>Clarification is needed on what is being done for training and skills. There is a lack of reference to data on employment and skills and it is suggested a regional skills analysis is undertaken. Latest ES not yet available, cannot confirm position</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
3.10.4	Assessment methodology	<p><u>(DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).</u></p> <p>The Scoping Opinion stated “<i>“The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities”.</i></p> <p>A meeting was held on 14th November 2024 to seek to agree the points raised in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p><u>The A 3rd Technical Note was issued to TDC on 28th March 2025 is currently being prepared</u> to seek agreement onto agree the study area and methodology.</p> <p><u>Updated position (February 2026):</u> <u>Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity.</u></p>	<p><u>In principle, TDC considers the revised study area and assessment criteria for the Socioeconomics, Recreation and Tourism assessment to be acceptable. However, TDC considers that where specific businesses fall outside the defined study area but are likely to experience adverse effects—such as wedding and wellness venues, hotels, or other ‘quiet countryside’ tourism uses—these impacts should be identified and assessed on a case by case basis.</u>No comments received to date on the Technical Notes.</p> <p>A 3rd Technical Note is currently being prepared to seek to agree the study area and methodology.</p>	Under discussion
3.10.5	Key parameters and assumptions	<p><u>Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265].</u> The key parameters and assumptions presented are considered appropriate.</p>	<p><u>Again, clarification is requested on what NGET are doing for training and skills. There is a lack of reference to data on District level employment and skills, and it is suggested that a regional skills analysis is undertaken. TDC would also like to take the opportunity again to suggest that skills should be considered separately from community benefits.</u>Latest ES not yet available, cannot confirm position</p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Updated position (February 2026):</u> <u>The potential of job uptake will be skills-level dependent, as well as taking into account suitability. Therefore, the Project is not able to confirm at this stage the number of district-level employment during construction.</u></p> <p><u>As set out in the Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265], paragraphs 15.7.13 to 15.7.14, the majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These would be typically sourced from the Applicant's existing pool of approved contractors. The number of jobs supported by the Project would be relatively low, approximately 480 jobs locally across the 180 km route over the four-year construction period. Hence, a significant effect would not be anticipated. It is therefore considered that a specific Employment and Skills Plan is not required for this Project and would be disproportionate to the scale of the potential effect.</u></p> <p><u>The Applicant noted the suggestion from TDC in relation to the consideration of skills separately from community benefits.</u></p>		

EIA – Baseline Conditions

3.10.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]. The baseline conditions and receptors presented are considered appropriate.</p>	<p><u>Generally acceptable however the baseline would benefit from:</u></p> <ul style="list-style-type: none"> <u>Greater local nuance, particularly in recognising the vulnerability of smaller, "quiet countryside" tourism and leisure businesses; and</u> 	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Updated position (February 2026):</u> <u>The ES Chapter 15: Socio-economics, Recreation and Tourism [APP-256] set out the identified tourism and recreation businesses within the Order Limits. 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266] set out the identified tourism and recreation businesses within a 3 km buffer from the Order Limits.</u></p> <p><u>The level of sensitivity matrix has been guided by various EIA guidance documents. Multiple factors have been considered when assigning a level of sensitivity, including availability, visitor numbers and the employment scale.</u></p>	<p><u>More explicit acknowledgement of sensitivity, given Tendring's high deprivation ranking and reliance on recreation, tourism, and amenity value for local wellbeing. Latest ES not yet available, cannot confirm position</u></p>	

EIA – Embedded, Standard and Additional Mitigation Measures

<p><u>3.10.7</u> Embedded mitigation</p>	<p><u>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Updated position (February 2026):</u> <u>Following each consultation the Applicant reviewed and considered all feedback received. The Applicant then went through a series of change control meetings to consider potential design changes in response to feedback, which resulted in changes to the alignment, access and order limits, ahead of the Applicant finalising its design for its DCO application. The</u></p>	<p><u>The proposed embedded mitigation relies heavily on avoidance rather than targeted design responses, and therefore offers limited reassurance for dispersed small tourism businesses, events, and amenity based uses; and</u></p> <p><u>The embedded mitigation does not fully reflect the district's higher vulnerability, including deprivation levels and reliance on countryside recreation and tourism for wellbeing and the local economy.</u></p> <p><u>Therefore, the embedded mitigation is not, on its own, sufficient in scale to address potential socio-economic, recreation, and tourism effects in</u></p>	<p>Under discussion</p>
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>mitigation hierarchy has been implemented sequentially, beginning with avoidance measures, followed by the targeted change control process, and concluding with the development of construction management plans.</u></p> <p><u>The Project has carefully considered the district's specific context. By prioritising the avoidance of sensitive receptors throughout the design process, the embedded mitigation aims to minimise potential impacts on these critical social and economic factors.</u></p> <p><u>Further discussion will take place following review of the information within the Local Impact Report (LIR). National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>Tendring. Additional, more locally responsive mitigation and management measures are likely to be required. TDC will elaborate on these points in our forthcoming LIR. Latest ES not yet available, cannot confirm position</u></p>	
3.10.8	Standard mitigation	<p><u>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of Chapter 15 (Socioeconomics, Recreation and Tourism) of the ES [APP-265] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Updated position (February 2026):</u></p> <p><u>Both standard and specific mitigation measures have been set out in the Outline CoCP [APP-300], Outline Construction Traffic Management Plan (CTMP) [APP-309] and Outline Public Rights of Way (PRoW) Management Plan [APP-329]. These include the proactive management of anticipated disruption to minimise the potential impact.</u></p>	<p><u>Insofar as the standard mitigation measures proposed for recreational/tourism businesses in the district of Tendring:</u></p> <ul style="list-style-type: none"> <u>• The mitigation is largely reactive and generic, focusing on managing disruption once it arises rather than proactively avoiding or minimising impacts at particularly sensitive locations;</u> <u>• It does not sufficiently distinguish between low sensitivity and more vulnerable businesses, such as small rural tourism businesses, caravan parks, events, amenity based uses, and small agricultural businesses with a recreational offer that rely heavily on setting and continuity of access; and</u> 	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>The Outline CoCP [APP-300], Outline CTMP [APP-309] and Outline PRoW Management Plan [APP-329] will be further developed post-consent to provide site-specific construction management plans.</u></p> <p><u>Due to the linear and rolling nature of the construction works, activities within any given area are anticipated to be of short duration. Therefore, potential significant cumulative impacts at a local level are not expected.</u></p>	<ul style="list-style-type: none"> <u>The scale of mitigation does not fully reflect the cumulative intensity and long duration of construction activity expected in parts of Tendring, nor the district's higher levels of deprivation and reliance on recreation and tourism for wellbeing and local resilience.</u> <p><u>Therefore, whilst the standard mitigation put forward may be appropriate as a baseline framework, on its own it will not be sufficient to address potential socio-economic, recreation and tourism effects in Tendring without additional, locally tailored mitigation, enhanced engagement, and clearer and legally binder delivery commitments during detailed design and construction.</u> Latest ES not yet available, cannot confirm position</p>	
3.10.9	Additional mitigation	<p><u>The consideration of additional mitigation measures are presented in Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>Updated position (February 2026):</u></p> <p><u>The Applicant notes TDC's comment on potential impacts on the road network arising from the proposed construction works.</u></p>	<p><u>Whilst the additional mitigation measures set out aim to respond directly to the types of impacts expected locally (e.g., temporary disruption to events, PRoWs, businesses, recreational assets, and community access) and are generally considered proportionate, this section fails to properly take into account potential for road network disruptions, road closures/addition HGV traffic on local roads and potential impacts on local business, tourism, hospitality etc</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>The Additional Mitigation section referenced different ES chapters that provide mitigations for Socio-economics, Recreation and Tourism effects, including ES Chapter 16 - Traffic and Transport [APP-271], which includes traffic related mitigation measures in the Outline CTMP [APP-309]. These measures include managing impacts arising from temporary road closures, providing diversion routes where appropriate, and maintaining communication with the local authorities and residents throughout construction activities.</u></p> <p><u>The Applicant is committed to having ongoing communication with the affected business, aiming to minimise the impact on the businesses. Please note that compensation cannot be accounted as a mitigation measure in EIA terms. Hence, this matter falls beyond the ES.</u></p>	<p><u>(also see comments under corresponding sections above around highways mitigation or lack thereof).</u></p> <p><u>There are at least three receptors in Tendring (Peak Fruit, the fishing lake north-west of Ardleigh and Ardleigh Caravan & Camping Park) that will undoubtedly experience significant residual adverse effects, and these relate to permanent land-take or long-term physical change that cannot be mitigated due to the severity of the impacts. TDC note NGET position which appear to be that Compensation discussions sit outside the ES however this does not address the potential prospect that some/all of these businesses (and others as mentioned in Ardleigh and Little Bromley Parish Councils Relevant Representation (and other) submission) will face very significant impacts which could put their future in doubt. Latest ES not yet available, cannot confirm position</u></p>	

EIA – Assessment Conclusions

<p><u>3.10.1</u> <u>0</u></p>	<p>Construction effects</p>	<p><u>The assessment of effects during construction is presented in Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]. The assessment of effects during construction presented is considered appropriate.</u></p>	<p><u>Sensitivity for a large number of businesses in the location in and around Ardleigh, Little Bromley, Great Bromley, Lawford and further afield is likely understated for especially:</u></p> <ul style="list-style-type: none"> <u>• Small, rural, seasonal businesses (e.g. caravan parks, angling venues, recreation-based enterprises and</u> 	<p>Under discussion</p>
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Updated position (February 2026):

The sensitivity matrix has been guided by various EIA guidance documents. These documents provide best practice frameworks for evaluating receptor sensitivity. For each receptor identified within the study areas, the level of sensitivity has been systematically assessed using a consistent and transparent methodology. This approach ensures that all receptors are evaluated based on the same criteria, reducing potential bias and subjectivity in the assessment process, as well as ensuring that sensitivity ratings assigned to different receptors can be reliably compared, supporting a robust analysis across the study areas.

Cumulative effects on the tourism economy, businesses and other built assets are set out in the ES **Chapter 17 - Cumulative Effects [APP-281]**.

Indirect effects, including financial effects on individual businesses, have been scoped out of the ES to maintain a proportionate assessment and the financial matter would be the subject of individual landowner negotiations and fall beyond the scope of an EIA. This is in accordance with the scope set out in the Scoping Report and the Scoping Opinion.

The assessment of businesses and other built assets has been conducted individually for each receptor identified. This is set out in The ES **Chapter 15 [APP-265]**, Table 15.22: Potential residual construction effect on built and other assets, Table 15.28 Residual operation (and maintenance) effect on built and other assets, and Appendix 15.1: Built and Other Assets within the 3 km Study Area **[APP-266]**.

The Applicant acknowledges TDC's comment on the effects on small tourism and recreation businesses in Tendring. Given the rolling nature of the linear works,

business relying on the rural road network to function).

- Businesses with limited resilience to short-term to medium term (read up to 7 years) disruption, even where impacts are judged to be "temporary".

Cumulative and indirect effects (e.g. reputational impacts, loss of custom during peak season, repeated access disruption) are explicitly (and conveniently) scoped out.

The assessment is area-wide, meaning very significant and serious localised harm in places like Ardleigh and Little Bromley can be diluted when judged at the Wider Study Area scale.

In summary, the assessment in 15.7 likely underplays the practical and economic risk to small tourism and recreation businesses in Tendring, particularly around Ardleigh and Little Bromley, and local business impacts may be more severe in reality than the "not significant" conclusions suggest, especially during peak tourist and event seasons. Latest ES not yet available, cannot confirm position

ID	Matter	National Grid's Position	Tending District Council's Position	Status
3.10.1 1	Operational (and maintenance) effects	<p><u>the construction activities in any particular area are likely to be short-term in nature.</u></p> <p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>Updated position (February 2026):</u></p> <p><u>The assessment on businesses and other built assets has been conducted based on the scope and methodology as set out in the Scoping Report, Scoping Opinion and Technical Notes shared with the LPAs.</u></p> <p><u>The magnitude of impact matrix has been guided by various EIA guidance documents and further developed following different thematic group engagement throughout the EIA stages. The magnitude of impact has been systematically assessed using a consistent and transparent methodology with no 'isolated cases'.</u></p> <p><u>The Outline CoCP [APP-300], Outline CTMP [APP-309] and Outline PRoW [APP-329] set out the proposed mitigation measures to ensure potential construction impacts arising from the Project will be managed.</u></p> <p><u>The assessment of the tourism economy has been conducted based on the Wider Study Area. Financial effects on individual businesses have been scoped out of the ES.</u></p>	<p><u>Findings for impacts on businesses, recreation and tourism during operation (and maintenance) are that</u></p> <ul style="list-style-type: none"> • <u>Most businesses and recreation/tourism assets, including those in and around Ardleigh and Little Bromley will be experiencing 'negligible or minor adverse, not significant operational effects'.</u> • <u>The conclusion is driven largely by findings that:</u> <ul style="list-style-type: none"> – <u>Access is retained,</u> – <u>Operations can continue, and</u> – <u>Visual effects are not considered to translate into material economic harm at business or area scale.</u> <p><u>TDC disputes all these points for multiple reasons set out in this version of the SOCG, in our RR and in our forthcoming LIR</u></p> <p><u>TDC notes that exceptions exist (i.e. higher impacts than the levels set out above) where permanent land take may lead to business closures or loss of use (e.g. the fishing lake), which are acknowledged as significant adverse effects but treated as 'isolated cases'.</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Further discussion will take place following review of the information within the Local Impact Report (LIR). National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>Tourism economy</u></p> <ul style="list-style-type: none"> • <u>The ES concludes that operational effects will not materially affect the Tendring tourism economy, on the basis that:</u> <ul style="list-style-type: none"> - <u>Attractions remain available,</u> - <u>The area's overall appeal is maintained, and</u> - <u>Visual change alone is not assumed to cause economic loss.</u> <p><u>Not only does TDC dispute this but also, these conclusions underestimate long-term operational risk for especially small recreation and tourism businesses around Ardleigh and Little Bromley, and those that rely heavily on the local road network and the current tranquil rural environment that will of course dramatically change.</u></p> <p><u>Also, localised economic impacts may be greater in practice than the "not significant" conclusions suggest, particularly where business viability depends on landscape quality and visitor perception. Latest ES not yet available, cannot confirm position</u></p>	

Draft DCO / Outline Management Plans / Mitigation and Monitoring

<p><u>3.10.1</u> Outline CoCP <u>2</u></p>	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 15 (Socio-economics, Recreation and</p>	<p><u>Most of the construction related mitigation measures are Non-specific by design and location because:</u></p>	<p>Under discussion</p>
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>Tourism) of the ES [APP-265].- and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP [APP-300].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated position (February 2026):</u></p> <p><u>The Outline CoCP [APP-300], Outline CTMP [APP-309] and Outline PRow Management Plan [APP-329] will be further developed post-consent to provide site-specific construction management plans.</u></p> <p><u>Please note that compensation cannot be accounted as a mitigation measure in EIA terms. Hence, this matter falls beyond the ES.</u></p> <p><u>The Applicant is committed to having ongoing communication with the affected business, aiming to minimise the impact on the businesses.</u></p>	<ul style="list-style-type: none"> • <u>The Outline CoCP is high level, with no asset/location specific commitments for individual businesses in Tendring.</u> • <u>The success of suggested mitigation is, for the most part, reliant on future contractor behaviour</u> • <u>Effectiveness of mitigation especially for small tourism and recreation businesses depends on:</u> <ul style="list-style-type: none"> - <u>Early and continuous engagement from NGET/Contractors?</u> - <u>Timely communication,</u> - <u>Sensitivity to peak seasons.</u> <p><u>There is no economic mitigation</u></p> <ul style="list-style-type: none"> • <u>The CoCP focuses on managing disruption, not on compensating for loss of trade, reputational impacts or closure (because of impacts).</u> 	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<p><u>The suggested mitigation package clearly aims to manage construction impacts in principle, including in Ardleigh and Little Bromley. These measures may not fully protect small, rural recreation and tourism businesses unless implemented proactively and locally sensitively – it is imperative that the DCO address these matters and effectively secure these measures in a legally enforceable manner.</u></p> <p><u>Detailed, location specific Construction Management Plans and strong local engagement will be critical to make the mitigation effective in practice. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course – it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround time of less than 7 days, moreover the ES is not available</u></p>	

Other matters as required

3.103.11 Cumulative Effects

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.1140.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 17.2 of Chapter 17 (Cumulative Effects) of the ES [APP-281]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	<u>Appropriately cover policy context, legislation and guidance</u> TDC position pending sight of the ES	<u>Agreed</u> Under discussion
EIA – Approach and Methods				
3.1140.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.1140.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Sections <u>Section 17.4 and 17.5</u> of Chapter 17 (Cumulative Effects) of the ES [APP-281]. <u>Updated position (February 2026):</u> <u>Further discussion will take place following the receipt of further information. National Grid will continue to engage with ECC on this matter.</u>	<u>Unclear – TDC need more time to thoroughly consider desktop and survey data.</u> TDC position pending sight of the ES	Under discussion
3.1140.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping	Agreed

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		Scoping Opinion received from the Planning Inspectorate.	Opinion received from the Planning Inspectorate.	
3.1140.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in <u>Sections Section 17.5 and 17.64 of Chapter 17 (Cumulative Effects) of the ES [APP-281]</u>. The key parameters and assumptions presented are considered appropriate.</p> <p><u>Updated position (February 2026):</u> <u>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</u> includes an assessment of Socio-economics, Recreation and Tourism, including effects on local businesses (Table 15.22, Table 15.28 and <u>6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]</u>) and tourism economy (Paragraphs 15.7.15 to 15.7.19 of Chapter 15) in the Tendring area. The assessments were undertaken in accordance with <u>6.19 Scoping Report - including appendices B to K [APP-296]</u>, <u>6.20 Scoping Opinion [APP-297]</u> together with other similar projects including Yorkshire GREEN and Bramford to Twinstead Reinforcement. The assessments conclude potential effects on local businesses located in Tendring range from negligible to moderate adverse (three businesses are predicted to be moderate adverse) effects during construction, and neutral to moderate adverse (two businesses are predicted to be moderate adverse) effects during operation, as well as a negligible adverse effect on tourism economy during construction.</p>	<p>TDC's view is that <u>section 17.4 (Chapter 17) underr-represents the intensity and lived reality of cumulative construction effects in Tendring, particularly around Ardleigh and Little Bromley.</u></p> <p><u>For socio-economics, recreation and tourism (and as set out elsewhere), assumptions rely heavily on:</u></p> <ul style="list-style-type: none"> <u>Standard mitigation being effective,</u> <u>Disruption being temporary and manageable,</u> <u>No meaningful interaction between perception, repeated disruption, and economic impacts.</u> <p><u>This approach is not suitable to TDC because communities will be experiencing stacked, prolonged construction phases across multiple (known) projects.</u></p> <p><u>The cutoff date (for known project insofar as cumulative assessment is concerns is 1 April 2025, this date clearly excludes later stage proposals that may realistically overlap in Tendring and completely ignores the fact that housing targets in TDC and wider Essex have now doubled, this approach reduces sensitivity and accuracy of assessment</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Cumulative effects on socio-economics (including effects on local businesses and tourism economy), are set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].</u></p> <p><u>A cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025, however, since 1 April, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. If this review identifies the potential for new or different significant effects or changes to the conclusions presented in the ES, these would be published during Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). Cumulative Effects documents would not be updated just because there is new information available about a development, where this information has been assessed as having no change to the assessment or conclusions presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281].</u></p> <p><u>National Grid has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the</u></p>	<p><u>insofar as the genuine emerging cumulative pressure</u></p> <p><u>It appears as though minor developments and non NSIP infrastructure are excluded, despite their relevance in an already saturated infrastructure landscape. The assessment also ignores the likely follow-up renewable energy related proposals that may well follow in this area if all this infrastructure is built here (e.g. more solar farms, interconnectors (such as Tarchon) etc).</u></p> <p><u>No corresponding uplift or acknowledgement in sensitivity is applied to areas like Ardleigh / Little Bromley despite acknowledged infrastructure clustering.</u></p> <p><u>Assumptions that effects are “no worse than assessed alone” tend to mask the severity of the compounding disruption, particularly for access, amenity and rural tourism perception.</u></p> <p><u>Ultimately, the cumulative assessment is not fully reflective of the exceptional cumulative construction burden experienced in Tendring.</u></p> <p><u>TDC strongly argues that the assumptions underplay prolonged, concentrated disruption effects in a highly rural area that is significantly disconnected from the strategic road network currently, and these are disruption effects outside landscape and</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>construction of new substations, which are proposed to be located adjacent to the EACN Substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel. Examples of this include use of a shared haul road for construction traffic, a common noise monitoring protocol, and coordination over landscape and ecological mitigation.</u></p>	<p><u>visual topics (so it does not even take into account landscape and visual effect topics).TDC position pending sight of the ES</u></p>	

EIA – Baseline Conditions

3.1140.6	Baseline conditions and receptors	<p><u>The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters (in Section 17.5 of Chapter 6 – 1617 (Cumulative Effects) of the ES [APP-123 to APP-287]. The baseline conditions and receptors presented are considered appropriate.</u></p> <p><u>Updated position (February 2026):</u> <u>Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>TDC generally agree that the baseline conditions and receptors are consistent with EIA Regulations and PINS Advice Note because they appear to:</u></p> <p><u>Include all relevant local developments and sensitive receptors; and are Reflective of Tendring's rural character, landscape sensitivity, PRow density, and ongoing NSIP activity.</u></p> <p><u>However, it should be stressed that TDC strongly disagree with the conclusions in the ES around cumulative impacts (see sections below and more information will be set out in our forthcoming LIR).TDC position pending sight of the ES</u></p>	Under discussion
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EIA – Embedded, Standard and Additional Mitigation Measures

3.1140.7	Embedded mitigation	<p><u>Updated position (February 2026):</u> <u>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES) [APP-123 to APP-287]. Embedded</u></p>	<p><u>The ES states that no additional mitigation is proposed for cumulative effects beyond the measures already embedded within the topic level assessments. However, as TDC has set out in multiple locations within this revised SoCG, and will further detail in</u></p>	Disagree Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p>mitigation measures, designed as an inherent part of the Project <u>are therefore relevant to Cumulative Effects, are set out in the environmental topic chapters Section 17.6 of Chapter 17 (Cumulative Effects) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>See comments on embedded mitigation in this SOCG. Further discussions will take place following National Grid's review of TDC's Local Impact Report (LIR). National Grid will continue to engage with TDC on this matter.</u></p>	<p><u>our forthcoming LIR, we fundamentally disagree that the embedded mitigation presented in several topic chapters is sufficient or effective. It therefore follows naturally that, if the cumulative effects assessment relies entirely on these same embedded measures—which we consider to be inadequately and inaccurately assessed—TDC must strongly disagree with the conclusion that no further mitigation for cumulative effects is required. TDC position pending sight of the ES</u></p>	
3.1140.8	Standard mitigation	<p><u>Updated position (February 2026):</u></p> <p><u>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES) [APP-123 to APP-287]. Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters (Section 17.6 of Chapter 6 – 1617 (Cumulative Effects) of the ES and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p><u>See comments on landscape and visual standard mitigation at ID3.9.8.</u></p> <p><u>The Applicant is required to consider National Landscapes under planning policy and guidance when routing, designing and assessing new electricity transmission infrastructure. Further</u></p>	<p><u>TDC has taken note of the package of standard mitigation measures proposed although the adequacy and success of this package will depend on whether the mitigation is sufficient in scale to manage the actual level of impact that Tendring faces—especially cumulative impacts from multiple NSIPs and local developments in and around Ardleigh and Little Bromley.</u></p> <p><u>On landscape and visual, TDC maintains that the standard measures reduce nuisance but cannot mitigate against significant cumulative landscape impacts in Tendring's sensitive open plateaux and landscapes bordering the Dedham Vale National Landscape.</u></p> <p><u>On PROWs, Recreational countryside use (by the Public) and other community</u></p>	Not agreed Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>details of the approach taken in relation to National Landscapes can be found in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127], 5.7 Policy Compliance Document [APP-086], 5.15 Design Development Report [APP-122] and 7.15 Design and Access Statement [APP-353].</u></p> <p><u>The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. While there would be significant effects during construction due to the installation of underground cables, these would reduce and be not significant during operation. There would be no significant effects on the National Landscape as a result of the proposed new East Anglia Connection Node (EACN) Substation or overhead lines. The assessment of effects of the Project on Dedham Vale National Landscape is set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].</u></p> <p><u>The Applicant recognises that stakeholders may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in 6.17 Environmental</u></p>	<p><u>impacts – whilst the standard mitigation may be deemed ‘appropriate’ on paper for safety and access management, TDC maintains the view that they are insufficient to address cumulative impacts on valued and well used rural paths and recreation assets.</u></p> <p><u>On Traffic, Noise, Dust, Water & General Environmental Risks – whilst the package of mitigation measures are wide ranging and aimed at reducing impacts on the environment, TDC continue to have reservations around whether the local roads will be able to cope with the sheer volumes of cumulative construction traffic and whether the noise and dust mitigation measures will in fact be effective if for example the very long cumulative construction phases for all the NSIPs combined (over 5 years) will straddle dry and hot summers which are becoming more prevalent now. TDC position pending sight of the ES</u></p>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Statement Chapter 17 - Cumulative Effects [APP-281]</u>. Paragraph 17.5.47 identifies that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.</p> <p><u>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</u> includes an assessment of impacts on both physical and mental wellbeing during both the construction and operation (and maintenance) phases of the Project. The assessment has been informed by the findings from other Environmental Statement chapters, for example <u>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</u>, <u>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</u>, <u>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</u> and <u>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</u>. The scope of environmental assessments has been undertaken in line with the approach set out in <u>6.19 Scoping Report [APP-228 – APP-296]</u> and agreed in <u>6.20 Scoping Opinion [APP-297]</u>. The scope of the health and wellbeing assessment was discussed with stakeholders prior to DCO submission at two Health and Wellbeing Thematic Group meetings.</p> <p><u>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</u> includes an assessment of the potential impacts of the Project in relation to the four protective factors for mental</p>		

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>health and wellbeing set out in the National Mental Health Development Unit³ toolkit.</u></p> <p><u>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</u> also considers <u>the potential impact of the Project on physical activity, which includes the potential for disruption to recreational routes or areas of open space and how that may affect opportunities for physical activity. Impacts on both the general population and on vulnerable groups (including children and the elderly) have been considered throughout the health and wellbeing assessment.</u></p> <p><u>The Applicant is committed to the principle of reducing traffic impacts on the district's highway network, identified within the 7.11 Transport Assessment [APP-333]. The Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts.</u></p> <p><u>The Applicant has developed the 7.3 Outline Construction Traffic Management Plan [APP-309] which includes a section on communicating and liaising with other developments within the area of the Project. Section 2.4.2 of 7.3 Outline Construction Traffic Management Plan [APP-309] states that National Grid is proposing to use the Permit Scheme in place and operated by Essex CC to best coordinate the street works required for the Project.</u></p> <p><u>An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was</u></p>		

³ Cooke et al., (2011) National Mental Health Development Unit toolkit.

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in relation to noise and vibration from the construction of the East Anglia Connection Node (EACN) Substation, cable corridor, or pylon construction with appropriate mitigation measures. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies (including working hours), as per Commitment NV05 in 7.2 Outline Code of Construction Practice [APP-300]. Based on the outcome of these assessments, specific mitigation measures (including temporal restrictions, where appropriate) would be identified and implemented such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from 7.4 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306], and this is secured via Requirement 4 in 3.1 Draft Development Consent Order [APP-056]. Significant cumulative noise effects are also not predicted within 6.17 Environmental Statement - Cumulative Effects [APP-281].</u></p>		
3.1140.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 17.4 and 17.56 of Chapter 17 (Cumulative Effects) of the ES [APP-281]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>Again TDC note that no new or bespoke additional mitigation has been proposed specifically in response to cumulative effects – for the same reason as set out under 3.11.7 TDC disagree.</u></p>	<p><u>Not Agreed Under discussion</u></p>

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>Updated position (February 2026):</u> <u>Please see ID3.11.8 for details on cumulative landscape effects.</u> <u>Please see ID3.11.8 for details on cumulative community and health effects.</u></p>	<p><u>To be clear, standard mitigation proposed under all the environmental topics are not adequate in scale to address some of the most key and significant cumulative effects affecting Tendring—including:</u></p> <ul style="list-style-type: none"> <u>• Landscape and visual cumulative effects, and</u> <u>• Cumulative recreational/PRoW and residential amenity effects (list not exhaustive).</u> <p><u>The ES does not introduce any genuinely additional or enhanced mitigation targeted at cumulative effects themselves. As such, TDC's most critical cumulative impacts remain unmitigated beyond standard and embedded measures. TDC position pending sight of the ES</u></p>	

EIA – Assessment Conclusions

3.1140.10	Construction effects	<p>The assessment of effects during construction is presented in Section 17.4 and 17.57 of Chapter 17 (Cumulative Effects) of the ES [APP-281]. The assessment of effects during construction presented is considered appropriate.</p> <p><u>Updated position (February 2026):</u> <u>Please see ID3.11.8 for details on cumulative landscape effects and cumulative community and health effects.</u></p>	<p><u>TDC's position is whilst the assessment (of effects during construction) is generally sound it falls short in fully representing the scale of cumulative construction disruption experienced by Tendring's rural communities, especially the communities in and around Ardleigh and Little Bromley, in, particularly relating to:</u></p> <ul style="list-style-type: none"> <u>• landscape and visual amenity</u> <u>• PRoW and recreational access</u> 	Under discussion
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ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			<ul style="list-style-type: none"> <u>combined sensory / residential amenity disturbance (noise, dust, general construction movement / activity)</u> <u>community and rural character impacts</u> <p><u>So, whilst TDC consider the assessment to be technically sound, it falls short in capturing how multiple, simultaneous construction pressures compound the lived experience for residents and users of Tendring's open countryside in the areas in and around Ardeigh and Little Bromley.</u> EPS: Likely cumulative Landscape and Visual impacts. Final ES not yet available and therefore not possible to pass a position – TDC echo position set out by Place Services</p>	
3.1140.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.57 of Chapter 17 (Cumulative Effects) of the ES [APP-281]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	<p><u>Yes – the assessment of cumulative operational (and maintenance) effects is broadly appropriate for Tendring District, however as detailed elsewhere below and in our forthcoming LIR the appropriateness does not necessarily mean that all operational impacts are acceptable, only that the assessment method and coverage are appropriate.</u> EPS: Likely cumulative Landscape and Visual impacts. Final ES not yet available and therefore not possible to pass a position – TDC echo position set out by Place Services</p>	Agreed Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.1140.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 17 (Cumulative Effects) of the ES [APP-281] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October to agree on the structure for the Outline CoCP [APP-300]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p><u>Updated position (February 2026):</u> <u>Please see ID3.11.8 for details on cumulative landscape effects, cumulative community and health effects and cumulative traffic, dust and noise effects.</u></p>	<p><u>The CoCP contains no additional or enhanced measures targeted at the significant cumulative construction impacts affecting areas in and around Ardleigh, Little Bromley and the surrounding countryside, particularly:</u></p> <ul style="list-style-type: none"> <u>• Landscape and visual effects during construction</u> <u>• PRow disruption and recreational amenity loss</u> <u>• Combined sensory disturbance (traffic, plant movement, haul roads, noise, dust) in small rural settlements</u> <p><u>The ES itself recognises that significant cumulative effects remain even after embedded/standard CoCP measures are applied, particularly for landscape/visual receptors and PRow users.</u></p> <p><u>Therefore, while the mitigation is appropriate in type, it is not sufficient in scale to avoid these significant residual effects in Tendring. The latest CoCP was only provided to TDC end of May 2025. The 1st and 2nd iterations were rough outline drafts. TDC is currently engaging with the latest CoCP and will be providing comments in due course—it is unreasonable to expect TDC to provide comment on the CoCP which is a very large document with a considerable number of appendixes, in a turnaround</u></p>	Under discussion

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
			time of less than 7 days, moreover the ES is not available	

Other matters as required

3.113.12 Development Consent Order

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
3.1244.1	DCO Wording Requirements	<u>The Applicant is grateful for the authorities' comments on the draft Development Consent Order ahead of submission and had regard to these when preparing 3.1 Draft Development Consent Order [APP-056] for submission. The Applicant will continue to engage with the authority on this matter during the Examination process.</u>	<u>TDC, alongside ECC, was offered an opportunity by the Applicant to review certain elements of the draft DCO prior to submission. Detailed and considered comments were provided in good faith during this process. However, no feedback was received from the Applicant on these comments, and it appears that many of the issues raised have not been addressed in the submitted DCO (APP-056). No explanation has been offered for this lack of engagement, which is disappointing and contrary to the spirit of collaborative resolution encouraged by the NSIP process.</u>	
3.12.2	DCO Wording	<u>In preparing 3.1 Draft Development Consent Order [APP-056], recent precedents have been followed and guidance in Advice Note 15 and Government guidance Planning Act</u>	<u>While TDC notes that the drafting of the DCO broadly follows the structure and content of previously approved Orders, drawing on established precedents and practical experience, it is essential to</u>	

ID	Matter	National Grid's Position	Tendring District Council's Position	Status
		<p><u>2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to 3.1 Draft Development Consent Order [APP-056] on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule.</u></p> <p><u>The structure and content of 3.1 Draft Development Consent Order [APP-056] is referenced extensively through the application documents and any material change to the structure of the document in particular would require the updating of a very significant amount of the application documentation and cannot be supported on that basis given the scale of the application that has to be examined in the examination period.</u></p>	<p><u>recognise that local circumstances may require departures from precedent. Where such changes would facilitate effective implementation and address local impacts, they should be considered seriously.</u></p>	

Other matters as required

3.123.13 Other Matters

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Tendring District Council on the date specified below.

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Tendring District Council:

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Date:

.....

Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
TDC	Tendring District Council
WFD	Water Framework Directive
WSI	Written Scheme of Investigation

Abbreviation	Full Reference
Zol	Zone of Influence
ZTV	Zone of Theoretical Visibility

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