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District Council - Clean Version

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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 Braintree District Council (BDC). BDC 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 of the DCO examination process, for Deadline 1. It is intended to be a live and working document which will be updated as the Project progresses and shared with BDC 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 BDC. The applicable matters considered within this SoCG apply to BDC'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

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 (AONB))
- 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 BDC
 - **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 BDC 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 BDC.

2.2.2 It is agreed that the below is an accurate record of the key meetings and consultation undertaken between National Grid and BDC in relation to the issues addressed in this SoCG. BDC may use Essex Place Services to provide comments on certain topics. EPS are a consultancy service that provides advice on behalf of BDC, therefore where this is referenced throughout the document it should be taken as comment provided by the Council.

Table 2.1 Summary of Key Engagement between National Grid and Braintree 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.

Date	Format	Topic/description
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
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.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) and Outline Landscape and Ecology Management Plan (LEMP) 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.
October 2024	Meeting	Meeting to discuss heritage assessment
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 issued the 2nd 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 2nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline CoCP including Appendix H – Draft Greenhouse Gas Reduction strategy.
May 2025	Email Correspondence	National Grid shared the ES Appendix 17.1: Long List of Other Developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the traffic, transport and PRow section of the Environmental Statement
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
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.
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of

Date	Format	Topic/description
		surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
January 2025	Email Correspondence	National Grid shared the Biodiversity Net Gain Strategy.
January 2025	Email Correspondence	National Grid issued the Protected Species Proposed Mitigation Measures to stakeholders including BDC.
May 2025	Meeting	National Grid hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
September 2025	Meeting	Option thematic group meeting to discuss feedback on the ecology section of the Environmental Statement.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place Service for ecology to discuss the Statement of Common Ground.

Air Quality

September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
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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.
January 2026	Meeting	Meeting to discuss the noise and vibration elements of the Statement of Common Ground.

Health and Wellbeing

September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
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.

Date	Format	Topic/description
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.
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.
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.

Date	Format	Topic/description
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
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Archaeology Working Group Meeting
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 BDC.
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 an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/description
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 012
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Email Correspondence	National Grid shared updated SSWSIs site 12
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
November 2025	Email Correspondence	National Grid shared shapefile for the phase 2 survey along with the priority area survey.
November 2025	Meeting	Archaeology Working Group Meeting
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email Correspondence	National Grid shared the WSI for the Phase 2 geophysical survey.
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss Essex Place Services (EPS) comments on 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.
January 2026	Meeting	Meeting to discuss matters relating to Built Heritage in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to the Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group Meeting
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

Date	Format	Topic/description
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.
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.
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 development consent application.
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology.
March 2025	Email Correspondence	National Grid issued the draft Arboricultural Impact Assessment.
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.

Date	Format	Topic/description
October 2025	Meeting	Further optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including BDC.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
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.
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.
September 2024	Technical Note	National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
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 BDC 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 BDC. 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 Table 3.2 to Table 3.11 provides 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	Braintree 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>Updated position (February 2026):</p> <p>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p> <p>National Grid's response relating to project timing is dealt with below (ID 3.2.2).</p>	<p>Owing to NESO's Clean Power report and the Hiorns report, BDC acknowledge, based on the information available to date, that the grid capacity offered by the Norwich to Tilbury project is needed, however the timeframes for when this reinforcement is required is more uncertain.</p> <p>If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns report, the Council consider that alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding) to ascertain whether they would achieve better environmental outcomes than the current submitted scheme.</p> <p>If so, alternative options could be put forward at pace to achieve the required network reinforcement instead of the submitted scheme.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
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.</p> <p>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>Updated position (February 2026):</p> <p>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>BDC acknowledges NG's contractual obligations, however considers that a further review of the contracted electricity generation is needed ahead of final submission of the DCO to assess whether the contracted position and the readiness of projects to connect as planned, is robust and thereby reaffirm the need and timescale for the planned Norwich to Tilbury Project as this could change the viability of alternate solutions to deliver the necessary capacity</p>	Under discussion
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>Updated Strategic Options and Backcheck Review documents.</p> <p>published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes,</p>	<p>BDC considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure across Braintree and Essex, should be explored fully should the timescales & contracted position be less acute than reported.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>including offshore alternatives.</p> <p>Updated position (February 2026):</p> <p>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</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>Updated Strategic Options and Backcheck Review documents 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 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>	BDC considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure across Braintree and Essex, should be explored fully should the timescales & contracted position be less acute than reported.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Updated position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>		
Project development process - Design				
3.2.5	Design Principles	<p>The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational reliability, can significantly limit National Grid's ability to adapt the aesthetic appearance of its infrastructure.</p> <p>Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules (relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals.</p> <p>While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and documented through the Development Consent Order process.</p>	<p>The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Advice in NPS EN1 Section 4.6 is for applicants to consider the criteria for good design at an early stage when developing projects. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Further, the Council also draws on the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design which has been prepared based on good practice and applicants are encouraged to follow the recommendations set out.</p> <p>BDC considers there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure NGET must follow a good design process to</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Furthermore, NPS EN-1 encourages developers “Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible” within the bounds of functional and safety constraints.</p> <p>The Planning Inspectorate Good Design advice advises that ‘Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important’. EN-1 refers to the importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the Design and Access Statement (document reference 7.15).</p>	<p>ensuring that the infrastructure proposed remains functional while realising the best local design outcomes</p>	
3.2.6	Pylon Route by Rivenhall Place	<p>Noting the concerns of BDC and following feedback from the public, together with the results of environmental surveys, amendments have been made to the proposed project design and associated Limits of Deviation in this location to enable the retention of the tree known locally as “Henry”.</p> <p>Updated position (February 2026): The Arboriculture Impact Assessment report [APP-236], Outline LEMP [AS-046] and Outline</p>	<p>As set out in BDC’s Targeted Consultation response, every effort should be made to protect the tree known locally as “Henry”, near to pylon TB092 – the route should be fixed in this area with limits of deviation not applied, or reduced, to ensure that the tree can remain</p> <p>Adequate controls are required to ensure that the root system of this tree</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		CoCP [APP-300] include the commitment to produce an Arboricultural Method Statement (AMS) to be produced (with a tree protection plan) to be agreed with the LPAs prior to construction work commencing.	is not damaged during construction.	
Project development process - Consultation				
3.2.7	2022 non-statutory consultation	<p>Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Under discussion
3.2.8	2023 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Under discussion
3.2.9	2024 statutory consultation	<p>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 Statement of Community Consultation (SoCC). Responses to feedback</p>	BDC have no evidence to suggest that the statutory consultation was not undertaken in accordance with the published Consultation Strategy. BDC refers to its response to this	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>received during statutory consultation are contained within the Consultation Report [APP-066].</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>	<p>consultation dated 25th July 2025 and awaits sight of the Consultation Report to assess the consultation responses that were received.</p>	
3.2.10	2025 targeted consultation	<p>Targeted consultations for Essex took place from 25 February 2025 – 27 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within the Consultation Report [APP-066].</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>BDC have no evidence to suggest that the targeted consultation was not undertaken in accordance with the published Consultation Strategy.</p> <p>While NG considered that some changes to the scheme may not be the most significant and are considered to be non-material, BDC considers that to local residents who may reside close to them, their significance may be greater, and they should therefore be given an opportunity to comment on them through the targeted consultation carried out earlier this year.</p> <p>The concentration of non-material changes may also have a bearing on their materiality and how they are experienced by local residents</p>	Under discussion
Other matters as required				
3.2.11	Community Benefits	<p>Socio-economic impacts on the local economy and the tourism sector are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be</p>	<p>BDC Response to Targeted Consultations (28/03/2025):</p> <p>BDC would strongly encourage NGET to positively respond to the issue of social value and community benefits particularly having regard to the</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>no significant impacts on the local economy as a result of the Project.</p> <p>Updated position (February 2026):</p> <p>In addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its guidance on community funds for 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>This would be delivered outside the development consent process, since it is not a material consideration in the 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). Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA.</p>	<p>Governments recently published Community Funds for Transmission Infrastructure</p> <p>Furthermore, BDC consider Norwich to Tilbury (N2T) will have extensive residual impacts that adversely affect the local economy and environment, as well as the health and wellbeing of communities in Braintree and Essex, 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.</p>	

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	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	<p>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].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>The ES has identified the relevant legislation, policy and guidance. BDC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed
EIA – Approach and Methods				
3.3.2	Study area	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.3.3	Data sources	<p>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].</p> <p>Updated position (February 2026):</p> <p>Further survey information from the 2025 season has been submitted to the Planning Inspectorate</p>	<p>Sufficient desktop data has been collected for the ES.</p> <p>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</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		in November 2025, achieving coverage of 97% of the Order Limits.	8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending. BDC 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 bat survey data which requires further information and is noted in ID3.3.18..	
3.3.4	Assessment Methodology	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	The Applicant 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. Updated position (February 2026): All methodologies for surveying licensable species have been agreed with Natural England.	The survey methods used are largely accepted, although note the comments made for ID3.3.19. BDC 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 survey methodology for bats which requires further information.	Agreed
3.3.6	Key parameters and assumptions	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 of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, " <i>Reinstatement: Habitat</i>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The key parameters and assumptions presented are considered appropriate.</p> <p>Updated Position: (February 2026):</p> <p>The Applicant has included within the Outline LEMP [AS-046] the commitment to a five-year monitoring period for tree and hedgerow replacement planting. Five years is considered sufficient to ensure successful establishment and is in line with other recent NSIP projects. The monitoring period is adaptive, as stated within the Outline LEMP which includes like for like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure. 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>The Applicant await further response from BDCon reinstatement.</p>	<p><i>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))”</i>, 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.</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under further review and that EPS will provide further comment following consideration around reinstatement.</p>	
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>Updated position (February 2026):</p> <p>Further survey information from the 2025 season has been submitted to PINS in November 2025, achieving coverage of 97% of the Order Limits.</p>	<p>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; ECC</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The scope of baseline surveys for European protected species surveys (including for roosting bats) was agreed in advance with Natural England. The survey data collected is sufficient to inform a robust ecological impact assessment as set out within Chapter 8 (Ecology and Biodiversity) of the ES [AS-026].</p>	<p>position pending. Note also the comments made for ID 3.3.5. BDC 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 baseline conditions and receptors for bats which requires further information and set out in ID3.3.20.</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>The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed
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]. 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): The suggested clarifications on standard mitigation from BDC have been included within</p>	<p>The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Outline LEMP documents have been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions to those documents. BDC confirmed in meeting regarding the Statement of Common Ground in 14 January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>the the Outline LEMP [AS-046] and Outline CoCP [APP-300] provided with the application. Mitigation for roosting bats is being agreed with Natural England as part of the draft licence process.</p>	<p>for bats which requires further information (see ID3.3.20).</p>	
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures is 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.</p>	<p>See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.9). BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed

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>Updated position (February 2026):</p> <p>Tables 8.23 and 8.24 within Chapter 8 (Ecology and Biodiversity) do not restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1–10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated</p>	<p>It would be useful transparency to advise on how long is it predicted to take for the long-term neutrality to be achieved for the affected receptors.</p> <p>The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision.</p> <p>BDC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction</p>	Under discussion
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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated.</p> <p>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 affected will be covered under a Natural England licence following pre-agreed mitigation measures.</p> <p>The Applicant notes the comments and will continue to engage with BDC on this matter.</p>	<p>and the appropriateness of mitigation.</p> <p>Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, <i>“the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees [any number of which could be classified PRF-M after further survey] and 16 trees with hibernation features.”</i></p> <p>As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected.</p> <p>The potential impact without any</p>	

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			<p>mitigation measures being applied is described in the ES Table 8.23: <i>“In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within the Order Limits. Effects would be considered significant.”</i> However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s) (i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.9, this is not considered to be a reasonably supported assessment.</p> <p>What is being proposed is a quasi District Level Licence-type approach</p>	

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			<p>for roosting bats (i.e. getting DCO without first completing surveys), when BDC is not aware of any such DLL method for bats having been trialled and approved.</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around timeframes.</p>	
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]. 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>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed
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.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p>	<p>The Outline CoCP has been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 22nd November 2024 and 19th February 2025.</p> <p>Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, BDC would welcome a commitment as to the minimum</p>	Under discussion

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		<p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated position (February 2026): BDC's comments are noted, and the Applicant will continue to engage with BDC on this matter. Full details of the ECoW's 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>qualifications/experience levels of the ECoWs to be used for specific tasks. ECC 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 licensed (level 2+ if endoscopy required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification.</p> <p>B16 – see comments for ID 3.3.9. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Ecological Clerk of Works.</p>	
3.3.14	Outline LEMP	<p>The Outline LEMP [AS-046] includes all relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline LEMP.</p> <p>Updated position (February 2026):</p>	<p>The Outline LEMP has been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19th February 2025.</p> <p>With respect to paragraph 6.1.8, clarity regarding the criteria used for defining a tree's bat hibernation potential is</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p> <p>A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Natural England (the statutory responsible body for bats) have approved the method to classify potential roost features which are in line with standard guidelines. 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 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.</p> <p>The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated Ground Level Tree Assessment (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.</p>	<p>sought? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features?</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around bat hibernation.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Other matters as required				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.</p> <p>The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</p> <p>No comments received to date on the BNG strategy from BDC.</p>	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.16	Biodiversity Net Gain (BNG) - Offsite	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.</p> <p>Offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.</p>	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Offsite BNG.	Under discussion
3.3.17	Arboricultural Impact Assessment (AIA)	<p>The Applicant issued the AIA in March 2025 for comment.</p> <p>Updated position (February 2026):</p> <p>The Applicant notes that BS5837 is a guidance document therefore compliance is not a requirement for this development consent application. The Scoping report highlights that there is deviation from the British Standard in terms of surveying Low value (C grade trees) and explained how these would be reported on (baseline data using canopy area and a 5 m root protection area applied to the canopy spread).</p>	<p>BDC provided the following comment in relation to the AIA in their feedback on Statement of Common Ground dated 21st December 2025:</p> <ul style="list-style-type: none"> • Comment on the SoCG is regarding the project's reliance on the AIA, which isn't compliant with BS5837:2012 as all the trees haven't been correctly captured as part of the assessment. In addition, to competently assess impacts we'd normally expect an at least a draft 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>This reference to the need for an Arboricultural Method Statement (AMS) to be produced (with a tree protection plan) and to be agreed with the LPAs prior to construction work commencing can be found in the Arboriculture Impact Assessment report [APP-236], Outline LEMP [AS-046] and Outline CoCP [APP-300].</p>	<p>Arboricultural Method Statement and Tree Protection Plan, which there is no mention of with the SoCG</p>	
3.3.18	Data sources (bats)	<p>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].</p> <p>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.</p>	<p>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; BDC position pending.</p>	Under discussion
3.3.19	Survey Methodology (Bats)	<p>The Applicant 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>All methodologies for surveying licensable species have been agreed with Natural England.</p> <p>BDC comments are noted, and the Applicant will continue to engage with BDC on this matter.</p> <p>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</p>	<p>Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, BDC believes further survey effort 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</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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.	a more confidently proportionate mitigation/ compensation scheme.	
3.3.20	Baseline conditions and receptors (Bats)	<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>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. Further information on this can be provided.</p>	BDC 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.	Under Discussion
3.3.21	Standard mitigation (Bats)	<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]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>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</p>	Measure B16's assumption that any action requiring a Natural England derogation licence can be " <i>reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit</i> " is considered unsound. BDC 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	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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.	non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for bats requires further information and review	

3.4 Air Quality

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	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] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to Policy and Legislation. It is noted that further discussion is required on this topic.	Under discussion
EIA – Approach and Methods				
3.4.2	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	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.4.3	Data sources	<p>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].</p> <p>Updated position (February 2026):</p> <p>Whilst the geographic extent of the study is noted, the use of data from a single meteorological station is considered to be proportionate given the low predicted pollutant concentrations and low risk of causing air quality objective exceedances, as noted by the council.</p> <p>Any change or addition of meteorological data sites is not considered to materially affect the conclusions of the study.</p>	<p>Opinion received from the Planning Inspectorate.</p> <p>BDC raised the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> Meteorological input data has been obtained for 2023 for a single recording station (Stansted Airport). Due to the length of the project route, it is likely that no single recording station would be representative of the whole study area and thus representative stations could be selected based on locality for example, section E (Braintree District Council) may be better represented by data from Andrewsfield Recording Station which is located further east than Stansted. It is noted however (and the Council are prepared to concede) that given that the assessment results are well below the objective levels, it is unlikely that this would change the overall conclusions of the assessment even if it did result in minor changes to the reported concentrations. 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.4.4	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
3.4.5	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.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to key parameters and assumptions. It is noted that further discussion is required on this topic.	Under discussion
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	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. Updated position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).	BDC raised the following comments in their Relevant Representation dated 27 th November 2025: <ul style="list-style-type: none"> Baseline conditions throughout the study area are reported to be good, with concentrations of NO2, PM10 and PM2.5 well below the relevant objectives/target values. 	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	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	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to embedded mitigation. It is noted that	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.4.8	Standard mitigation	<p>adequate, in terms of its nature and scale, to address potential effects.</p> <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]. 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): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>further discussion is required on this topic.</p> <p>BDC raised the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> There are some predicted significant dust impacts in the absence of site specific mitigation. However, the residual impacts following the implementation of mitigation at high-risk sites is expected to be not significant. This is agreed but is contingent on the proposed mitigation being fully implemented. 	Under discussion
3.4.9	Additional mitigation	<p>The consideration of additional mitigation measures is 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>No comments raised in the BDC relevant representations or through review of the Statement of Common Ground for Air Quality in relation to standard mitigation. It is noted that further discussion is required on this topic</p>	Under discussion
EIA – Assessment Conclusions				
3.4.10	Construction effects	<p>The assessment of effects during construction is presented in Section 7.7 of Chapter 7 (Air Quality) of the ES. The assessment of effects during construction presented is considered appropriate.</p>	<p>Braintree District Council raised the following comments in their Relevant Representation dated 27th November 2025:</p> <ul style="list-style-type: none"> The ES assessment assumes that construction dust effects would occur across the full extent of the 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Updated position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>Order Limits. Likewise, it is assumed where there is uncertainty regarding the scale of earthworks that a 'large' magnitude applies. These are a worst-case approach but are considered appropriate in the circumstances to reduce uncertainty and capture the fullest possible extent of impacts.</p>	
3.4.11	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>No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to operational effects. It is noted that further discussion is required on this topic</p>	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	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 on 9 October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29 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>BDC raised the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> It is recognised that there is some uncertainty regarding Nonroad Mobile Machinery (NRMM) emissions associated with the project; the proposed mitigation measures appear appropriate although their likely effect cannot be quantified. The Council have previously suggested that mention could be made of siting of Nonroad 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated position (February 2026): Siting of NRMM will be undertaken during detailed design post consent.</p> <p>The Dust Management Plan is an appendix to the Outline CoCP and therefore forms the same overall document.</p> <p>The Outline CoCP [APP-300] commitment GG19 states that "Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for the vehicle type which will be defined in the CoCP."</p> <p>As also stated in the Outline CoCP [APP-300], "This outline management plan will be fully developed based on detailed design information to be provided by the Main Works Contractor(s). The final version will be submitted for approval in accordance with Requirement 4 (construction management plans) of the draft DCO ([APP-056] prior to commencement of development. This process ensures that detailed design is developed with clear alignment to the principles and procedures within this document."</p> <p>It is considered this commitment (GG19) addresses the concern about compliance with emissions regulations, to ensure that no likely significant effects will occur from these construction activities.</p>	<p>Mobile Machinery (NRMM) and ensuring it is compliant with emissions regulations within the Outline Code of Construction Practice (OCoCP). This however has not been implemented, and it is suggested the OCoCP is updated to include this. Notably it is included in the Dust Management Plan (DMP). The Council would recommend that section AQ02 in the OCoCP be amended for consistency across related documents</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Other matters as required				

3.5 Contaminated Land, Geology and Hydrogeology Matters

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 9.2 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) [APP-181] of the ES . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The relevant policy context, legislation and guidance has been presented within the ES.	Agreed
EIA – Approach and Methods				
3.5.2	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. The Study Area used within the ES is in accordance with that agreed within the Scoping Report and Scoping Opinion.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.5.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The list within paragraph 9.4.2 in 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181] states the sources of information used to inform the baseline assessment, which include georeferenced historical Ordnance Survey maps from the National Library of Scotland and historical Ordnance Survey maps from Envirocheck reports generally for areas of anticipated undergrounding. This is also included within 6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182].6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182] describes the various sources of information used to inform the assessment for all sections of the Project (including that parts of the Project under Braintree District Council's jurisdiction). The Envirocheck reports were obtained to provide additional information in areas of significant undergrounding/ trenchless crossings and therefore they do not cover Section E (Braintree).The Project falls under the Construction (Design and</p>	<ul style="list-style-type: none"> BDC summarise the following comments from their relevant reps from November 2025:A review of the Contaminated Land Geology and Hydrogeology ES Chapter [APP-181] Section 9.4.2 did not identify a reference to the source(s) of information utilised to identify potentially contaminative previous land uses, although reference to NLS mapping is included in the Bibliography of the ES chapter. However, Section 9.1.6 of the accompanying Baseline Information and Preliminary Contamination Risk Assessment [APP-182] does make reference to historical Ordnance Survey maps from Envirocheck reports as sources of information but for 'parts of the route' only. The baseline condition data sources require further clarity. Although BDC would generally agree with the low risk rating awarded to all identified sources of contamination within Section 5 of the site, further details of the specific information upon which the various low risk ratings were based is requested. Information on how the baseline conditions relating to Unexploded Ordnance (UXO) have been identified is required. 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).</p>		
3.5.4	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Scoping Report and Scoping Opinion received from the Planning Inspectorate.	received from the Planning Inspectorate. The methodology used within the ES is in line with the approach presented within the Scoping Report.	
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES . The key parameters and assumptions presented are considered appropriate.	BDC does not have any comments specifically on the key parameters and assumptions presented within the ES.	Agreed
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES . The baseline conditions and receptors presented are considered appropriate.	BDC does not have any comments specifically on the baseline conditions and receptors within the ES.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES . Embedded mitigation is considered appropriate and adequate, in terms of its	BDC does not have any comments specifically on the embedded mitigation presented within the ES.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.5.8	Standard mitigation	<p>nature and scale, to address potential effects.</p> <p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and set out in the Outline CoCP [document reference X.XAPP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BDC does not have any comments specifically on the standard mitigation measures presented within the ES.</p>	Agreed
3.5.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The ES report states that over and above the embedded and standard mitigation measures, no additional mitigation measures are necessary. BDC has no comments on additional mitigation.</p>	Agreed
EIA – Assessment Conclusions				
3.5.10	Construction effects	<p>The assessment of effects during construction is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The assessment of effects during construction presented is considered appropriate. The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is</p>	<p>BDC's only outstanding comment about construction effects is that UXO is mentioned only in relation to embedded mitigation. Clarification on the Applicant's approach to assessing and managing the construction phase UXO risk is required.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).</p>		
3.5.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	BDC does not have any further comments with regards to operational effects within the ES.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	<p>The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing. Commitment GH10 describes that the results of risk assessments undertaken in accordance with LC:RM will be discussed with the LPA and EA, and any mitigation or remediation considered necessary will be agreed with the LPA and EA. Commitment GH08 that relates to a protocol for dealing with any unexpected contamination includes for provision of a policy describing how notifications and approvals will be agreed with the LPA.</p>	<p>The content of the Outline CoCP covers all relevant issues for Contaminated Land, Geology & Hydrogeology. The content of the measures in the Outline CoCP is considered appropriate. The level of detail is commensurate with that which would be expected in an Outline CoCP. Some of the commitments in the Outline CoCP (e.g. GH10) include notification of the Local Planning Authority “as appropriate” as part of unexpected contamination protocols and post-consent ground investigations. Clarification of how this notification will be secured through the DCO is required. BDC also requires details on how this notification procedure will operate in practice, and what post-consent documentation the Applicant will submit in compliance with the procedures outlined in the Outline CoCP.</p>	Under discussion
Other matters as required				

3.6 Architecture and Soils

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Agriculture and Soils

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered in the assessment of Agriculture and Soils are noted in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 6.2 of Chapter 6 (Agriculture and Soils) [APP-138] of the ES.</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the Agriculture and Soils assessment.</p>	<p>BDC raised the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> The ALC survey has been carried out following the correct methodology and follows the industry guidance for reporting 	Under discussion
EIA – Approach and Methods				
3.6.2	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
3.6.3	Data sources	<p>Sufficient survey data, including a detailed Agricultural Land Classification (ALC) survey and supporting predictive ALC grading, has been collected to inform the assessment as presented within Section 6.4 of Chapter 6 (Agriculture and Soils) of the ES [APP-138].</p> <p>As presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]</p>	<p>BDC raised the following comments in their Relevant Representation dated 27th November 2025:</p> <ul style="list-style-type: none"> The Applicant has undertaken good levels of engagement with Natural England to get to an agreement on the assessment of land within the order limits that was not available for surveying. The predicted Agricultural Land Classification (ALC) approach is 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>and 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], predictive Agricultural Land Classification (ALC) mapping was undertaken on a 100 m grid across the entire Order Limits, including points where auger surveys had been undertaken. This approach allowed for predictive ALC grading in areas where detailed surveys were not possible, as well as analysis of the accuracy of the predictions (comparing predictive grades against surveyed grades). ALC surveys were undertaken within the Order Limits, along the central alignment; out of a total of 1,877 survey points, 1,011 comprise detailed site surveys and 866 comprise a predictive assessment.</p> <p>Figure A6.1.1 Detailed Agricultural Land Classification within 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] included an error whereby the surveyed ALC grades were not visible on the ALC map. As a result, it appeared that the final ALC mapping units were derived solely from the predictive model, which was not the case. The ALC mapping units were informed by both survey data and predictive modelling. This error has been corrected, and Figure A6.1.1 Detailed</p>	<p>robust and provides a greater level of accuracy than having to rely on provisional ALC data. The ability to ground truth the predicted model adds to the robustness of the assessment. There are however some aspects of this approach that may need to be clarified:</p> <ul style="list-style-type: none"> • The size of area that this method was used for should be clearly stated as it is misleading within the assessment. A review of the data shows it has been used for more than two thirds of the site. • The final ALC mapping units look to have been drawn based on the final output of the predictive model alone as the ALC grade for many of the surveyed points has been changed to fit the ALC grade of surrounding predicted ALC points. The ALC grades forming actual surveyed points should have greater weighting in the drawing of final ALC mapping units. 	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.6.4	Assessment methodology	<p>The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.6.5	Key parameters and assumptions	<p>Key parameters and assumptions made with regards to Agriculture and Soils are summarised in Section 6.4 of Chapter 6 (Agriculture and Soils) of the ES [APP-138]. The key parameters and assumptions presented are considered appropriate.</p> <p>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] details the total extent of the Order Limits as 3,755 ha. It was calculated that 3,461 ha of agricultural land would be temporarily removed from agricultural production during construction, while a further 203.1 ha would be lost permanently during operation (including 172.7 ha which is Best and Most Versatile (BMV) agricultural land); the remainder of the Order Limits comprises urban and non-agricultural land. The Applicant can confirm that the permanent loss of agricultural land has not been included within the assessment of temporary land loss.</p> <p>As stated in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139], the detailed Agricultural Land Classification</p>	<p>BDC raised the following comments in their Relevant Representation dated 27th November 2025:</p> <ul style="list-style-type: none"> The assessment of Agricultural Land and Soil follows recognised assessment methodology, and the Council are in agreement in the outcome of the significance of the assessment. The assessment of temporary impacts does need further clarification as it is unclear whether the agricultural land assessed as permanent land loss has been included within the land total for the temporary land loss. If it has been included, then the assessment is overestimating the magnitude of temporary impacts, however this would not impact on the significance of the effect. The ALC survey has been carried out following the correct methodology and follows the industry guidance for reporting. There are some areas where the quality of the assessment and approach can be questioned. This is 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>(ALC) surveys were undertaken in line with the revised ALC guidelines by competent soil scientists following the British Society of Soil Science (BSSS) Professional Competency in Soil Science No.2 - Agricultural Land Classification - England and Wales. A total of 16 soil pits were dug and assessed covering the representative soil types and cross checked with best available data, including descriptions of structure for soil associations and soil series. Undertaking further soil pits was constrained by landowner access issues but it is considered the information gathered is sufficient to support the land grade assessments.</p>	<p>mainly with the number of profile pits for the size of the site and the data collected from these pits. The profile pits are key aspects of the soil survey that are required to accurately determine soil structure and stone content which are critical for wetness and draughtiness limitation calculations. The use of auger borings on their own may miss key characteristics.</p>	
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Agriculture and Soils are presented in Section 6.5 of Chapter 6 (Agriculture and Soils) of the ES [APP-138]. The baseline conditions and receptors presented are considered appropriate.</p>	<p>No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for this area around baseline conditions and receptors for Soils and Agriculture. It is noted that further discussion is required on this topic.</p>	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	<p>The embedded mitigation measures, which is that designed to be an inherent part of the Project for which development consent is sought, for potential Agriculture and Soils effects are set out in Section 6.6 of Chapter 6 (Agriculture and Soils) of the ES [APP-138]. The embedded mitigation is</p>	<p>No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for this area around embedded mitigation for Soils and Agriculture. It is noted that further discussion is required on this topic.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.6.8	Standard mitigation	<p>considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects.</p> <p>Standard mitigation measures to reduce potential Agriculture and Soils effects during construction are summarised in Section 6.6 of Chapter 6 (Agriculture and Soils) of the ES [APP-138] and set out in the Outline Code of Construction Practice (CoCP) [APP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects.</p>	<p>No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for this area around standard mitigation for Soils and Agriculture. It is noted that further discussion is required on this topic.</p>	Under discussion
3.6.9	Additional mitigation	<p>The consideration of additional mitigation measures for Agriculture and Soils is presented in Section 6.6 of Chapter 6 (Agriculture and Soils) of the ES [APP-138]. No additional mitigation measures are proposed to minimise effects, other than the measures for handling organic-rich (peaty) soils, which are already set out within the standard mitigation Outline Soil Resource Plan (SRP) as part of the Outline CoCP [APP-300].</p>	<p>No comments raised in the BMSDC Relevant Representation or through review of the Statement of Common Ground for this area around additional mitigation for Soils and Agriculture. It is noted that further discussion is required on this topic.</p>	Under discussion
EIA – Assessment Conclusions				
3.6.10	Construction effects	<p>The assessment of effects during construction for Agriculture and Soils is presented in Section 6.7 of Chapter 6 (Agriculture and Soils) of the ES [APP-138]. The assessment of effects during</p>	<p>BDC raised the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> Any temporary haul routes should be designed in such a way to avoid damage to agricultural land, especially 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>construction presented is considered appropriate.</p> <p>The construction of temporary haul roads and storage of excavated materials is detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] with an illustrative detail showing a typical haul road cross section with separated topsoil and subsoil storage included in 2.6.3 Design and Layout Plans - Traffic and Transport [APP-043].</p> <p>Haul roads need to be routed adjacent to the proposed works (e.g. the overhead line and underground cable alignments). The haul roads have been routed, where practicable, to minimise impacts on agricultural land (including known private drainage measures), hedgerows and trees but without significantly increasing the route length (which adds additional stone and therefore vehicle movements) and taking cognisance of the above constraint. Details regarding vegetation clearance requirements for the haul road are in paragraph 4.8.37 to 4.8.41 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130].</p> <p>The Applicant continues to engage and discuss site-specific constraints relevant to the detailed design and construction methodology with affected landowners.</p>	<p>any drainage measures which may have been implemented by the landowner. The Council's experience with regard to the Bramford to Twinstead NSIP is that the haul routes appear to be excessive in number and have resulted in excessive hedgerow removal, which could potentially be avoided. In addition, Requirement 10 (reinstatement schemes) should be strengthened to ensure that temporary haul routes are required to be removed following completion of construction</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.6.11	Operational (and maintenance) effects	The assessment of effects during operation and maintenance for Agriculture and Soils is presented in Section 6.7 of Chapter 6 (Agriculture and Soils) of the ES [APP-138] . The assessment of effects during operation and maintenance presented is considered appropriate.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for this area around operational (and maintenance) effects for Soils and Agriculture. It is noted that further discussion is required on this topic.	Under discussion
EIA – Cumulative Impact Assessment Conclusions				
3.6.12	Inter-project cumulative effects	An assessment of the effects which could result from the Project in cumulation with other developments in the vicinity of the Project is provided in Section 17.8 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . The cumulative effects presented are considered appropriate.	Position pending review of the ES.	
3.6.13	Intra-project cumulative effects	An assessment of intra-project effects is provided in Section 17.8 of Chapter 17 (Cumulative Effects) of the ES [APP-281] . The intra-project effects presented are considered appropriate.	Position pending review of the ES.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.14	Outline CoCP	The draft Outline CoCP [APP-300] includes all relevant mitigation measures specified in Chapter 6 (Agriculture and Soils) of the ES and is appropriate for managing construction impacts from the Project on Agriculture and Soil receptors. Meeting held in October 2024 to agree on the structure for the Outline CoCP.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for this area around the Outline CoCP for Soils and Agriculture. It is noted that further discussion is required on this topic.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<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>		

3.7 Noise and Vibration

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in Chapter 2 (Key Legislation and 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>	BDC noted in their feedback dated 19 December 2025 noted that they agree policy and legislation is relevant and considered within the assessment.	Agreed
EIA – Approach and Methods				
3.7.2	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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.7.3	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] .	BDC noted in their feedback dated 19 th December 2025 noted that they BDC's position same as 3.5.2.	Agreed
3.7.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.5	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-256] . The key parameters and assumptions presented are considered appropriate. Additional information relating to noise and working hours has been provided at ID 3.5.10.	BDC noted in their feedback dated 19 th December 2025 that this matter remains under discussion due to potential issues with noise and core working hours.	Under discussion
EIA – Baseline Conditions				
3.7.6	Baseline conditions and receptors	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.	BDC noted in their feedback dated 19 th December 2025 noted that they agree baseline conditions and receptors are considered appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	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	BDC noted in their feedback dated 19 th December 2025 noted that they agree that embedded mitigation measures are both appropriate and adequate.BDC	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		[APP-256]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	consider this matter remains under discussion pending further review.	
3.7.8	Standard mitigation	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] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC noted in their feedback dated 19 th December 2025 noted that they agree that standard mitigation measures are both appropriate and adequate. BDC consider this matter remains under discussion pending further review	Under Discussion
3.7.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 14.6 of Chapter 14 (Noise and Vibration) of the ES [APP-256] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC noted in their feedback dated 19 th December 2025 noted that they agree that no additional mitigation measures have been identified. BDC consider this matter remains under discussion pending further review.	Agreed

EIA – Assessment Conclusions

3.7.10	Construction effects	<p>The assessment of effects during construction is presented in Section 14.7 of Chapter 14 (Noise and Vibration) of the ES [APP-256]. The assessment of effects during construction presented is considered appropriate.</p> <p>Updated position (February 2026):</p> <p>Although working periods outside of the 'daytime' periods identified in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, as detailed in Section 4 of Chapter 14: Noise</p>	<p>BDC provided the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> The construction impacts associated with this project have the potential to have significant noise and vibration impacts on residents and businesses in the Braintree District and beyond. This is in part owing to the excessive construction hours put forward by the Applicant which are 	Under discussion
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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>and Vibration of the ES (6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256] are more sensitive to noise the 'daytime' period (hence their lower threshold for potential significant effects), works during these periods would not directly lead to a significant adverse effect. Consideration of the sensitivity of the working period would be required as part of the application of Best Practicable Means (BPM) as per commitment NV01 within the Outline CoCP (7.2 Outline Code of Construction Practice [APP-300]).</p> <p>The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are:</p> <ul style="list-style-type: none"> Monday – Friday: 0700 to 1900 Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 <p>Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order [APP-056].</p> <p>The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns</p>	<p>07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (asset out in Requirement 7(1) of the draft Development Consent Order (dDCO)).</p> <ul style="list-style-type: none"> Not only are the construction hours excessive, dDCO Requirement 7(5) would allow for start up and close down activities up to 1 hour either side of the core working hours, with no decibel (db) limit on noise. Finally, there are numerous operations which can be completed outside of the core working hours listed in Requirement 7(4). These construction hours, alongside the start-up and close down provision and those activities outside of constructions hours, are far in excess of what the Council would consider to be reasonable and allow no real respite for Noise Sensitive Receptors (NSRs). Moreover, the severity of the construction hours especially at weekends has the potential to understate the significance of effect at Noise Sensitive Receptors (NSRs) 	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</p> <p>The construction working hours set out in 3.1 Draft Development Consent Order [APP-056] define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in 7.2 Outline Code of Construction Practice [APP-300].</p> <p>The inclusion of Sundays and Bank Holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>and Bank Holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer term exposure to construction impacts. A blanket prohibition on Sundays/bank holidays would materially harm the deliverability of this Critical National Priority (CNP) project.</p> <p>The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project.</p> <p>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice [APP-300], significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [APP-056] within the final Code of Construction Practice.</p>		
3.7.11	Operational (and maintenance) effects	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	BDC noted in their feedback dated 19 th December 2025 noted that they agree that effects related to operational phases are considered appropriate.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		operation (and maintenance) presented is considered appropriate.	BDC consider this matter remains under discussion pending further review.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP	<p>The Outline CoCP 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. 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>E-mail from BDC on 27th November 2024 – comments on the 1st Iteration of the Outline CoCP regarding noise and vibration. Recommended that further review is required.</p> <p>Comments on 2nd Iteration are yet to be received.</p> <p>BDC noted in their feedback dated 19th December 2025 noted that they agree that the outline management plans are appropriate. BDC consider this matter remains under discussion pending further review.</p>	Under discussion
Other matters as required				
3.7.13	NSR off Old Mill Lane	<p>The assessment of weekend construction works within Chapter 14: Noise and Vibration of the ES (6.14 Chapter 14 - Noise and Vibration document reference 6.14) [APP-256] includes two key assumptions which means this interpretation is not applicable in practice.</p> <p>1. Mitigation is assumed for weekend works</p> <p>Weekend and bank holiday periods are more sensitive than weekdays, reflected in the lower threshold of 55 dB LAeq,T (compared to 65 dB for weekdays). The weekday assessment assumes</p>	<p>BDC provided the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> The NSR located off Old Mill Lane (Threadkells), to the southeast of Coggeshall Hamlet has been identified as a 'Medium' magnitude of impact in terms of construction noise before mitigation. The receptor appears to be approximately 140m from a proposed pylon location 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>no mitigation as a worst-case to identify 'hot-spots' where mitigation is required to avoid significant adverse effects. Applying this assumption to weekends would overstate impacts. Instead, the weekend assessment assumes a reasonable 10 dB attenuation from mitigation, meaning the same 'hot-spot' locations identified for weekdays without mitigation are the same as those for weekends with indicative mitigation (because the difference between the thresholds is also 10 dB).</p> <p>2. Temporal restrictions are applied</p> <p>Where thresholds could still be exceeded with mitigation, temporal restrictions are considered as part of Best Practicable Means (BPM). This ensures that significant adverse effects do not occur during weekend periods.</p> <p>Implementing mitigation would ensure that significant adverse effects would not occur in this situation, or others like it, as follows:</p> <ul style="list-style-type: none"> • The Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the Outline CoCP (7.2 Outline Code of Construction Practice [APP-300]) • Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which 	<p>(TB78). From Table A14.1.2, Pylon construction noise would be between 60dB – 66dB at the NSR. This could potentially be greater than +5 dB above the ABC category threshold during the weekend and therefore a 'Large' magnitude of impact. This argument could be applied to other NSRs across the route.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]).</p> <ul style="list-style-type: none"> • Should the resultant construction noise levels exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), with the inclusion of all practicable mitigation measures, temporal restrictions would be required to either: <ul style="list-style-type: none"> – Avoid works during that period at that location, or – If works during this period cannot be avoided, limit the duration of the works such that the effect is not significant. <p>Such situations may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the contractor and the local authority.</p>		
3.7.14	LOD requirements	<p>The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on Figure 4.1: Proposed Project Design of the ES (6.4.F1 Environmental Statement (ES) Figure 4.1: Proposed Project Design [APP-133]).</p> <p>However, the Limit of Deviation (LoD) for overhead lines (and associated pylons) is</p>	<p>BDC provided the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> • The ES chapter appears to have based its assessment from the locations of the pylons as shown on the works plans. However, this does 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>considered in Section 9 of Chapter 14: Noise and Vibration of the ES (6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]). It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy Statement for England, the NPPF and Planning Practice Guidance for Noise).</p> <p>It should also be considered that the LoD includes the conductors and the associated conducted swing, as shown in 2.6.2 Design and Layout Plans – Overhead Lines [APP-042]. As such, in practice, pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at 'bends' in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD.</p> <p>The LoD was reviewed through the EIA process when producing the ES and there are no locations where movement towards the edge of</p>	<p>not appear to also take into account LOD, which as drafted in the dDCO (Article 5 (a)), allow for the deviation from the lines or situations shown on the works plans within the defined order limits. As such, in the example of the receptor on Old Mill Lane, the pylon could in theory be 50m away to the edge of the order limits. There are also other examples of this. As such, it is not apparent that the ES has considered the worst-case scenario for construction noise impacts so the level of effects could be higher than predicted.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>the LoD, and towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures. Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the Outline Code of Construction Practice (7.2 Outline Code of Construction Practice [APP-300]) for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon 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 the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]).</p>		
3.7.15	Noise limits	<p>There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in</p>	<p>BDC provided the following comments in their relevant representations dated 27th November 2025:</p> <ul style="list-style-type: none"> The Council consider that a noise limit should apply to the start up and close down hours at the nearest NSR's – this should be a maximum of 50db and precedent for this is 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Section 4 of Chapter 14: Noise and Vibration of the ES (6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]) .	again found in the Bramford to Twinstead DCO Requirement 7(4) (page 65).	
3.7.16	Piling operations	Such a restriction should be borne out of assessment outcomes, to avoid significant adverse effects rather than blanket restrictions which in some cases may be unnecessary. The assessment of construction noise and vibration detailed in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] indicates that there are no likely significant adverse effects from any construction activity, including piling, with the implementation of best practicable means (BPM) to reduce effects.	BDC provided the following comments in their relevant representations dated 27th November 2025: <ul style="list-style-type: none"> In respect of piling (Requirement 7(2)) this restriction should apply to all piling operations (as per Bramford to Twinstead DCO) and not just percussive piling as proposed by the Norwich to Tilbury dDCO. 	Under discussion
3.7.17	Noise Screening	This comment relates to the inclusion of screening in some plant items in Appendix 14.1: Construction Noise and Vibration Data of the ES (6.14.A1 Environmental Statement Appendix 14.1 – Construction Noise and Vibration Data [APP-257]) . It is correct that a 10 dB reduction was applied to some fixed plant items, such as generators. However, the inclusion of this screening mitigation does not affect the overall activity noise level. This is because noise from items such as generators, even in an unmitigated scenario, is substantially lower than that from other plant associated with the same activities, and therefore does not materially increase the combined noise level. Additionally, the worst-case activity for each construction phase is considered in the assessment. The	BDC provided the following comments in their relevant representations dated 27 th November 2025: <ul style="list-style-type: none"> Standard noise screening reduction of 10dB is shown for fixed plant. However, paragraph 14.7.6 of the ES chapter 14 states that “for the purposes of this assessment, no specific mitigation (such as screening) is included”, this needs to be clarified. 10dB is the maximum reduction applied for screening, details of how this will be provided and maintained is not shown. 	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		outcome is therefore the same irrespective of the inclusion of this screening. However, such items would be expected to be screened, but the outcome of the assessment is not dependent on that being the case.		

3.8 Health and Wellbeing

Braintree District Council defer comments regarding Health and Wellbeing to Essex County Council. Please find details of this in the Essex County Council Statement of Common Ground (document reference 5.9.3).

3.9 Historic Environment

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation (Built Heritage)	<p>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) [AS-068] of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Updated position (February 2026): The Applicant notes the LPAs request for further</p>	[Built Heritage] 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.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>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 Environment of the ES (6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]). 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 states at 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</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		heritage assets.		
3.8.2	Policy and legislation (Archaeology)	<p>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 [AS-068].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Further discussion will take place following review of the information within the LIR.</p>	<p>ECC (Archaeology) is currently reviewing the relevant documentation. The ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance.</p>	Agreed
EIA – Approach and Methods				
3.8.3	Study area	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>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.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	Agreed
3.8.4	Data sources (Built heritage)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) [AS-068] of the ES.</p> <p>Updated position (February 2026):</p> <p>Non-designated historic buildings were identified in addition to those included in the HER and</p>	This matter is agreed.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>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.</p>		
3.8.5	<p>Data sources (archaeology) - Desktop</p>	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES [AS-068].</p>	<p>ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026.)</p>	Agreed
3.8.6	<p>Data sources (archaeology) – survey data</p>	<p>Sufficient survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES [AS-068].</p> <p>The Applicant will continue to engage on this matter.</p>	<p>There has been sufficient desktop data collected, however, the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review.</p> <p>This matter remains under discussion.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.7	Assessment methodology (Built heritage)	<p>The Scoping Opinion stated: <i>“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.”</i></p> <p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024.</p> <p>BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of ‘high value’ could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. National Grid will consider this during the update of the Baseline Report for DCO submission.</p> <p>It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion.</p> <p>Historic Environment Viewpoints feedback will be taken into account for the assessment.</p> <p>The Applicant position regarding non-designated heritage assets is as outlined in section 3.7.1 (Policy and Legislation) above.</p>	<p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024.</p> <p>BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of ‘high value’ could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. National Grid will consider this during the update of the Baseline Report for DCO submission.</p> <p>It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion.</p> <p>Historic Environment Viewpoints feedback received on 4th March 2025 from Essex Place Services (EPS).</p> <p>As agreed in the meeting in January 2026, this matter is agreed.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.8	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	ECC is in agreement with this matter.	Agreed
3.8.9	Key parameters and assumptions (Built heritage)	<p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [AS-068]. The key parameters and assumptions presented are considered appropriate.</p> <p>In March 2025, The Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.</p>	<p>BDC is currently reviewing the ES Chapter.</p> <p>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.”</p> <p>As agreed in the meeting in January 2026, this matter is agreed.</p>	Agreed
3.8.10	Key parameters and assumptions (Archaeology)	<p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [AS-068]. The key parameters and assumptions presented are considered appropriate.</p> <p>February 2025, the Applicant issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic.</p> <p>March 2025, the Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.</p>	ECC (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 “ <i>The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.</i> ”	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Baseline Conditions				
3.8.11	Baseline conditions and receptors (Built heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [AS-068] . The baseline conditions and receptors presented are considered appropriate. Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).	This matter is agreed.	Agreed
3.8.12	Baseline conditions and receptors (Archaeology)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [AS-068] . The baseline conditions and receptors presented are considered appropriate. February 2025, the Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.	ECC agreed this matter during call in January 2026.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.13	Embedded mitigation	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 [AS-068] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Matter remains under discussion for archaeology. 5.15 Design Development Report [APP-122] provides an explanation of the main changes in	BDC 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 underground cable where there will be an impact on archaeological remains.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted consultations held in 2025. 5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.</p>	<p>Further time is needed to review 5.15 Design Development Report [APP-122] but we note this refers only to changes requested to the route alignment which were made before the final ES.</p>	
3.8.14	Standard mitigation (Built heritage)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [AS-068] 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.</p> <p>Updated position (February 2026):</p> <p>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,</p>	<p>This matter is agreed with regards to commitment H06.</p> <p>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</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>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:</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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.</p> <p>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</p>	<p>as works are undertaken to allay fears and allow the monitoring of effects.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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.		
3.8.15	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [AS-068] 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.	ECC agreed this matter during call held January 2026.	Agreed
3.8.16	Additional mitigation	The consideration of additional mitigation measures is presented in Section 11.6 of Chapter 11 (Historic Environment) of the ES . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The matter will remain under discussion for archaeology until the outline AMS WSI is finalised.	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. ECC noted during call in January 2026 that this matter is not relevant for Built Heritage.	Under discussion
EIA – Assessment Conclusions				
3.8.17	Construction effects (Built heritage)	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [AS-068] . The assessment of effects during construction presented is considered appropriate.	This matter is agreed.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.18	Construction effects (archaeology)	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [AS-068] . The assessment of effects during construction presented is considered appropriate.	This section is currently under review (ECC Archaeology) Email 4 th Nov 2024 - Archaeology – consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. Email 6 th Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed
3.8.19	Operational (and maintenance) effects (Built heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [AS-068] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed
3.8.20	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [AS-068] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.21	Outline CoCP	The Outline CoCP [APP-300] includes all relevant construction mitigation measures specified in Chapter 11 (Historic Environment)	This section is currently under review (Archaeology). Further comments will	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>of the ES [AS-068] 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>See 3.7.14 and 3.7.15 for current position.</p> <p>Discussion will be progressed following review of the LIR.</p>	<p>be included within the LIR which require action.</p> <p>(Built Heritage) See 3.7.14 for current position.</p>	
Other matters as required				
3.8.22	<p>Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.</p>	<p>The Applicant shared overarching WSIs in March – June 2024 and December 2024.</p> <p>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.</p>	<p>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.</p>	Agreed
3.8.23	<p>Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.</p>	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p> <p>There are still addenda to site specific WSIs forthcoming that have yet to be issued.</p>	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.24	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required.</p> <p>The Applicant issued the Outline AMS-OWSI for the post-consent stage of the project in April 2025.</p> <p>Discussion will be progressed following review of the LIR.</p>	<p>The Outline AMS-WSI is currently not agreed, further comments will be provided in the Local Impact report (Archaeology)</p>	Under discussion
3.8.25	Programme for completion of archaeological fieldwork	<p>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.</p> <p>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'.</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	<p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed

3.10 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	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	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>	BDC noted in the meeting to discuss the Statement of Common Ground on 2 nd February 2026 and through comments provided on 19 th December 2025 that the correct guidance has been used and that this matter is agreed.	Agreed
EIA – Approach and Methods				
3.9.2	Study area	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.	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.	Agreed
3.9.3	Data sources	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] .	BDC noted in the meeting to discuss the Statement of Common Ground on 2 nd February 2026 and through comments provided on 19 th December 2025 that this matter is agreed.	Agreed
3.9.4	Assessment	The outline methodology for assessing	The outline methodology for assessing	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	methodology (including LVIA methodology and viewpoints)	<p>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 28 November 2024 to follow up any additional changes to the assessment.</p> <p>National Grid issued an update on LVIA Viewpoints and Methodology in March 2025.</p>	<p>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>E-mail from BDC dated 8th October 2024 – stated some areas that are agreed, e.g. study area and general categories for visual susceptibility, methodology for ZTV mapping and viewpoint photography and photomontage creation. However, this e-mail also stated some areas of concern in relation to viewpoints and visual value.</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed subject to matters surrounding residential assessment where further discussion is required.</p>	
3.9.5	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>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed</p>	Agreed
EIA – Baseline Conditions				
3.9.6	Baseline conditions	The baseline conditions and receptors for	BDC noted in the meeting to discuss the	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	and receptors	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.	Statement of Common Ground on 2 nd February 2026 and through comments provided on 19 th December 2025 that this matter is agreed	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	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>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>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p>	<p>Statutory consultation response stated that 'In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding is required to protect valued local landscapes, long-distant rights of way and rural amenity sites.'</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is not agreed. It was noted that the mitigation isn't considered adequate due to the amount of significant effects that are still predicted.</p>	Not Agreed
3.9.8	Standard mitigation	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	BDC noted in the meeting to discuss the Statement of Common Ground on 2 nd February 2026 and through comments provided on 19 th December 2025 that	Not agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>[APP-226] 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.</p>	<p>this matter is not agreed. It was noted that the mitigation isn't considered adequate due to the amount of significant effects that are still predicted.</p>	<p style="background-color: red; color: white; text-align: center;">Not agreed</p>
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 13.6 of Chapter 13 (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.</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is not agreed. It was noted that the mitigation isn't considered adequate due to the amount of significant effects that are still predicted.</p>	
EIA – Assessment Conclusions				
3.9.10	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>E-mail received from Suffolk County Council on 4 Nov 2024 suggested that concerns had been raised by a number of stakeholders (inc. BDC) regarding the lack of assessment for tree and hedgerow loss along the route.</p> <p>The Applicant can confirm that tree and hedgerow loss has been assessed as part of the assessment of effects on landscape character during construction and operation. This has been captured within the Arboricultural Impact</p>	<p>E-mail received on 4th Nov 2024 suggested that concerns had been raised by a number of stakeholders (inc. BDC) regarding the lack of assessment for tree and hedgerow loss along the route.</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed upon receipt of the list of significant effects.</p>	<p style="background-color: yellow; text-align: center;">Under discussion</p>

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Assessment and Ecology Biodiversity Net Gain assessment.</p> <p>Updated position (February 2026): The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226] and appendices [APP-228 to APP-232] identifies significant adverse residual effects on landscape and visual receptors during construction. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following Visual Receptor Areas (VRA) are predicted to experience significant effects up to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham.</p>		
3.9.11	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>Updated position (February 2026): The LVIA set out in 6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226] and appendices [APP-228 to APP-</p>	BDC noted in the meeting to discuss the Statement of Common Ground on 2 nd February 2026 and through comments provided on 19 th December 2025 that this matter is agreed upon receipt of the list of significant effects.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>232] identifies significant adverse residual effects on landscape and visual receptors during operation. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following Visual Receptor Areas (VRA) are predicted to experience significant effects up to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham.</p>		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	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 9 October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29 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>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is still under discussion pending further review of the Outline CoCP.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.9.13	Outline LEMP	<p>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.</p> <p>Meeting held on 9 October to agree on the structure for the Outline LEMP. A further meeting was held on 29 January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p> <p>A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Comments from EPS will be taken on board for the next iteration of this document.</p>	<p>E-mail from EPS dated 22nd October 2024 with comments on the structure of the Outline LEMP. No further comments received on the 2nd iteration to date.</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is still under discussion pending further review of the Outline LEMP. It is noted that consideration of EPS comments on the Outline LEMP should be considered when assessing the SoCG.</p>	Under discussion
Other matters as required				
3.9.14	Residential Visual Amenity Assessment	<p>Appendix 13.4: Residential Visual Amenity Assessment (RVAA) of the ES (6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 & APP-234]) was prepared in line with the Landscape Institute's 'Technical Guidance Note 2/19 Residential Visual Amenity Assessment'.</p> <p>Worst-case scenarios, where a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which is predominantly, but not always, the closest point to the property) have been</p>	<p>RR: In terms of residential visual amenity, the LVIA [APP-233] examined visual effects on 10no. groups or individual properties within the Braintree District. Of these, 2no. properties were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both instances, further assessment concluded that amenity would not be breached. However, the Council are concerned about the visual amenity of E7 and E8, especially taking into</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>considered in the RVAA.</p> <p>With regards to property E7 – West Ford Farm Cottage, the worst-case scenario would be the movement of pylon TB93 (currently proposed along the ‘centreline of work’ approximately 152 m from the property’s garden and 157 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on the Works Plans (2.3 Works Plans - Section E [APP-021])). This would make the pylon, instead, approximately 65 m from the property’s garden and 60 m from its dwelling (but, importantly, not ‘adjacent’ to the residential boundary as is stated in BDC’s Relevant Representation). In this worst-case scenario the Project would be appear closer (therefore larger) in the views experienced from the property, and the pylon would still be located within the field to the property’s immediate north, but there would not be any additional impacts. Additionally, the property’s northern boundary hedge and trees would still filter some views from the dwelling’s ground floor windows and the garden’s main patio area to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed</p>	<p>account Limits of Deviation (LOD), which as drafted, enable placement of pylons anywhere in the order limits (which in the case of E7 and E8 are adjacent to their residential boundaries). Indeed, the LOD as proposed allow lateral and/or longitudinal variations within the Order Limits, with further flexibility as to vertical limits (height above, and depth below, ground). Any re-positioning of the pylons from the positions shown could have a greater effect on visual receptors, with seemingly little safeguards to prevent or other mitigate any additional harm of/to those visual receptors.</p>	

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		<p>and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on West Ford Farm Cottage that would give rise to the 'residential visual amenity threshold' being breached.</p> <p>With regards to property E8 – Whiteheads Farm, the worst-case scenario would be the movement of pylon TB98 (currently proposed along the 'centreline of work' approximately 126 m from the property's garden and 158 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on the Works Plans (2.3 Works Plans - Section E APP-021])). This would make the pylon, instead, approximately 75 m from the property's garden and 100 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in Braintree Borough Council's Relevant Representation). In this worst-case scenario the Project would be appear closer (so larger) in the views experienced from the property, but there would not be any additional impacts. Additionally, the evergreen hedgerows along the property's north-east facing boundary would still filter some views from the dwelling's ground floor windows and the garden to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently,</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on Whiteheads Farm that would give rise to the 'residential visual amenity threshold' being breached.		

3.11 Socio-economics, Recreation and Tourism

Braintree District Council defer comments regarding Socio-economics, Recreation and Tourism to Essex County Council. Please find details of this in the Essex County Council Statement of Common Ground (document reference 5.9.3).

3.12 Cumulative Effects

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	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) [APP-126] and Section 17.2 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BDC noted in their feedback dated 19 th December 2025 noted that as far as they can see, all relevant legislation and guidance has been complied with.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Approach and Methods				
3.10.2	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
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects) [APP-281] of the ES .	BDC noted in their feedback dated 19 th December 2025 noted that they agree data is sufficient.	Agreed
3.10.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.6 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . The key parameters and assumptions presented are considered appropriate.	BDC position pending full review of the ES and remains under discussion.	Under discussion
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters (Chapters 6 – 16 of the ES). The baseline conditions and receptors presented are considered appropriate.	BDC position pending full review of the ES and remains under discussion.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES). Embedded mitigation measures, designed as an inherent part of the Project are set out in the environmental topic chapters of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC position pending full review of the ES and remains under discussion.	Under discussion
3.10.8	Standard mitigation	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). Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters of the ES 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.	BDC position pending full review of the ES and remains under discussion.	Under discussion
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC position pending full review of the ES and remains under discussion.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA – Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . The assessment of effects during construction presented is considered appropriate.	BDC position pending full review of the ES and remains under discussion.	Under discussion
3.10.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects) [APP-281] of the ES . The assessment of effects during operation (and maintenance) presented is considered appropriate.	BDC position pending full review of the ES and remains under discussion.	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 17 (Cumulative Effects) [APP-281] of the ES and is appropriate for managing construction impacts from the Project. Meeting held on 9 th October to agree on the structure for the Outline CoCP. A further meeting was held on 29 th January 2025 to address comments from stakeholders. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.	BDC position pending full review of the ES and remains under discussion.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Other matters as required				

3.13 Development Consent Order

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.1	DCO Requirements – management plans	The Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302] and the Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] are provided as appendices of the Outline Code of Construction Practice [APP-300] . The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the draft Development Consent Order [APP-056] .	Control Documents – excludes a Construction Environmental Management Plan, Materials and Waste Management Plan, Noise and Vibration Management Plan. Clarity should be provided on which documents will cover the scope of these documents.	Under discussion
3.11.2	DCO Requirements – construction hours	The proposed core working hours allow for efficient delivery while maintaining safeguards to manage noise and other impacts.	Construction Hours – the hours of work need amending and relevant planning authority to be notified of any working outside of core hours.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend.</p> <p>The assessment presented in Chapter 14 (Noise and Vibration) of the ES [APP-256] is based on a set of parameters that include the core working hours for the construction phase of the Project. It assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start up and close down activities taking place up to one hour either side of the core hours, and activities which can take place outside of the core working hours. The assessment concluded that with the embedded mitigation and controls set out in the Outline Code of Construction Practice [APP-300], significant effects during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of the draft</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>DCO [APP-056] within the final Code of Construction Practice.</p> <p>The Applicant does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours.</p>		
3.11.3	DCO Requirements – management plans	<p>The Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] is controlled by Requirement 4 of Schedule 3 to the draft DCO [APP-056]. The definition of Code of Construction Practice in Article 2 includes its appendices.</p>	It is noted that no Soil Management Plan Requirement is proposed. This should be included.	Under discussion
3.11.4	DCO Requirements – timescales	<p>The processes and timescales for decision making are proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid.</p> <p>There is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the draft DCO [APP-056] to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult</p>	Discharge of Requirements – longer period of time required for discharge owing to complexities of scheme. This should be 35 days at the very minimum. Consider consistent use of business days rather than days for calculating consent periods.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		with those required by the terms of the Requirement in question.		
3.11.5	DCO Requirements – further information	Given the Project's status as a project of critical national importance, the Applicant considers five days for the relevant discharging authority to request additional information to be proportionate and appropriate. Paragraph 1(4) of Schedule 4 to the draft DCO [APP-056] allows the relevant authority to seek the Applicant's consent to request further information after the five-day period if necessary.	Discharge of Requirements – longer period of time required (minimum of 7 business days) to enable consultees to identify whether further information is required. To the extent that the Council as discharging authority is obliged to consult with third parties, an amendment to require the Applicant to serve relevant paperwork on the relevant Requirement Consultee at the same time as serving on the Council would enable efficient use of time (this happens to some extent on B2T DCO).	
3.11.6	DCO Requirements – fees	The Applicant will update this figure in the next draft of the DCO.	Schedule 4 – Discharge of Requirements – Paragraph 3 – fee needs to be updated in line with latest planning fee guidance.	Under discussion
3.11.7	DCO Wording – pre-commencement operations	The definition of 'pre-commencement operations' has been carefully considered to ensure it is suitable for the specific circumstances of the Project.	Pre-commencement Operations – amendments to definition to bring in line with Bramford to Twinstead DCO, but also exclude those operations which the relevant planning authority considers give rise to a materially new or different environmental effect.	Under discussion
3.11.8	DCO Wording - Construction Environmental Management Plan,	7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302] and 7.2 Outline Code of Construction Practice Appendix F - Outline	Article 2 Control Documents – excludes a Construction Environmental Management Plan, Materials and Waste Management Plan, Noise and Vibration	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	Materials and Waste Management Plan, Noise and Vibration Management Plan	<p>Noise and Vibration Management Plan [APP-306] are provided as appendices of 7.2 Outline Code of Construction Practice [APP-300].</p> <p>7.2 Outline Code of Construction Practice [APP-300] includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required.</p> <p>These documents are controlled by Requirement 4 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056].</p>	Management Plan. Clarity should be provided on which documents will cover the scope of these documents.	
3.11.9	DCO Wording – certified documents	The definition of Environmental Statement in Article 2 of the draft DCO [APP-056] includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the Requirements, therefore the proposed change is not necessary.	Environmental Statement – the Council request that any supplemental Environmental Statement submitted to discharge Requirements is added to the set of certified documents to ensure there is a central repository for all relevant environmental material.	Under discussion
3.11.10	DCO Wording – maintenance	<p>In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network.</p> <p>The inclusion of an obligation to maintain the Project is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a</p>	<p>Maintain – needs to be clear who decides whether the maintenance would give rise to any materially new or materially different environmental effects.</p> <p>Maintenance of authorised development – request a mandatory obligation on Undertaker to maintain ('shall') and also to decommission and remove parts of the authorised development which become obsolete.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		safe, effective and efficient electricity transmission system.		
3.11.11	DCO Wording – limits of deviation	Six metres is the same upward deviation as was allowed for in The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and is intended to provide a necessary but proportionate degree of flexibility in the construction of the authorised development and to reduce risk. It allows the addition of two standard pylon sections, each measuring three metres in height. The limits of deviation have been assessed in Chapter 4 (Project Description) of the ES [APP-130] .	Limits of Deviation – amendments to limits of vertical deviation from 6m to 4m (as per B2T DCO).	Under discussion
3.11.12	DCO Wording – notification of works	Notification of any works to alter the layout, etc. of streets would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, this is not considered to be appropriate or practical in the circumstances of the Project.	Power to alter layout etc of streets – request notification as planning authority in relation to such works.	Under discussion
3.11.13	DCO Wording – notification of works	Notification of any works to accesses would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, this is not considered to be appropriate or practical in the circumstances of the Project.	Accesses – request notification as planning authority in relation to such works. If Undertaker is to have consenting role, seek extension of time limits for response to 35 days in line with B2T DCO.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		A 28-day determination period (or such other period as agreed by the relevant street authority and the undertaker) is appropriate and proportionate for the Project.		
3.11.14	DCO Wording – discharge of water	A 28-day determination period (or such other period as agreed by the person receiving the application for consent and the undertaker) is appropriate and proportionate for the Project.	Discharge of Water – to the extent relevant to BDC, deemed consent should be issued after 35 days as per B2T DCO.	Under discussion
3.11.15	DCO Wording – protective provisions	The draft DCO [APP-056] , once granted, will provide the relevant planning consent for these protective works. Owners and occupiers of the land would be notified prior to exercising certain rights under Article 21 (Protective Provisions), except in the case of emergency.	Protective Works – relevant planning authority to be consulted where any such works outside order limits are required in case separate planning permission necessary.	Under discussion
3.11.16	DCO Wording – tree works outside of Order limits	Article 50 (Felling or lopping) within the draft DCO [APP-056] , together with Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055] , set out controls on the Applicant's powers to fell and lop trees. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. In particular, Article 50(2) of the draft DCO places a statutory duty on the Applicant not to cause any unnecessary damage to any tree, shrub, shrubbery or hedgerow, or important	Felling and lopping of trees – request advance notice for those proposed tree works which are outside Order limits (i.e. near/ overhanging) and consent of planning authority prior to any necessary work to ensure appropriate controls.	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>hedgerow, when exercising its powers under this article.</p> <p>The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within the draft DCO and to ensure that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant</p>		
3.11.17	DCO Wording – tree preservation orders	<p>Article 51 (Trees subject to Tree Preservation Orders) within the draft DCO [APP-056], together with Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055], set out controls on the Applicant's powers to fell and lop trees protected by TPOs, both within and outside the Order limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024.</p> <p>The use of 'near' is to mirror the wording used in Article 50 (Felling and lopping of trees, etc). A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or</p>	<p>Trees subject to Tree Preservation Orders – a definition of “near” is required for the avoidance of doubt. Additional wording should be added to the effect that advance notice of proposed works must be given to the planning authority and opportunity given for the planning authority to impose reasonable conditions (i.e. as to method of pruning/appropriate timing of tree work).</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>from constituting a danger to persons construction, maintaining, or operating the authorised development.</p> <p>Additionally, Article 51(3) of the draft DCO places a statutory duty on the Applicant not to cause any unnecessary damage to any tree when exercising its powers under this article, a breach of which would be an offence.</p> <p>The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within the draft DCO and to ensure that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.</p>		
3.11.18	DCO Wording – definitions and terminology	The use of days rather than business days in a small number of places in the draft DCO [APP-056] is consistent with precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024.	Safeguarding – recommendation that all time limits are expressed in business days for consistency across the dDCO.	Under discussion
3.11.19	DCO Wording – associated development	The Applicant does not agree that the words 'in the opinion of the relevant planning authority' should be added to paragraph (u) of the Associated Development section of Schedule 1 of the draft DCO [APP-056] . A range of works could fall into this paragraph and it would be a disproportionate burden on both the Applicant and the relevant authority if the Applicant had to	Authorised Development – to introduce some control over associated but currently unspecified works then the words 'in the opinion of the relevant planning authority' should be added to the final paragraph of the definition of 'associated development' to bring the text in line with that at Schedule 3	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>seek their opinion on the materiality of any new or different environmental effects in each case which could in turn frustrate the delivery of the Project.</p> <p>The Applicant would welcome clarification on the typo referred to in the preamble to Work No. 32.</p> <p>It is not clear for which works the relevant planning authority would welcome notification. The Applicant is conscious of the potential for significant additional administrative burden, both on the Applicant and the relevant authority.</p>	<p>paragraph 1(4) but also the definition of “maintain” (Article 2). Correct typo in preamble to Work 32. The relevant planning authority should be notified of works carried out for the avoidance of doubt.</p>	
3.11.20	DCO Wording – written scheme of stages	<p>The Applicant is content to submit the written scheme to the authorities for their information, as set out in the draft DCO [APP-056]. However, given the scale of the Project, the large number of local authorities within the Order limits and the complexities of delivering such a large project within a limited timeframe, it is not appropriate or proportionate for the Applicant to seek each authority’s consent to the written scheme setting out the stages of the authorised development. Doing so could severely delay the delivery of the Project.</p>	<p>Schedule 3 – Paragraph 3(2) – add “for approval” at end of text at Art 3(2).</p>	Under discussion
3.11.21	DCO Wording – design and layout plans	<p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the draft DCO [APP-056]. As part of the process, the authority will be able to form a view as to whether any</p>	<p>Schedule 3 – Paragraph 6 – for consistency and in the interests of sound planning principles, the wording “general accordance with” should be amended to “in substantial accordance with.” The planning authority should have a say in whether the changes give rise to any materially new or materially different</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of the draft DCO.	environmental effects from those identified in the environmental statement.	
3.11.22	DCO Wording – design of permanent buildings	<p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the draft DCO [APP-056].</p> <p>As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of the draft DCO.</p>	Schedule 3 – Paragraph 12 – Design of Buildings – for consistency and in the interests of sound planning principles, the wording “general accordance with” should be amended to “in substantial accordance with.”	

Other matters as required

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Braintree 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 Braintree District Council:

.....

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
BDC	Braintree District Council
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
MSBDC	Mid Suffolk and Babergh District Council
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
WFD	Water Framework Directive

Abbreviation	Full Reference
WSI	Written Scheme of Investigation
Zol	Zone of Influence
ZTV	Zone of Theoretical Visibility

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