

AENC-NG-CNS-REP-0054

# Norwich to Tilbury

## Volume 5: Reports and Statements

Document: 5.9.3 Draft Statement of Common Ground - Essex County Council (ECC) (incl LLFA and Highways) - Tracked Changes Version

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**nationalgrid**

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# 1. Introduction

## 1.1 Overview

1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and Essex County Council (ECC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to ECC. The applicable matters considered within this SoCG apply to ECC'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
- Green Infrastructure
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- 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 will 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 ECC
- **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 ECC 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 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 ECC.

Table 2.1 Summary of Key Engagement between National Grid and Essex County Council

Date	Format	Topic/Description
<b>General</b>		
April 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
October 2022	Site visit	T-pylon site visit with case officers.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
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.
July 2023	Meeting	Dunton Hills Garden Village discussion.
September 2023	Meeting	All host authority workshop.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Dunton Hills Garden Village discussion.
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.
February 2024	Meeting	East Anglia Connection Node (EACN) access proposals meeting.
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	ECC Minerals Plan discussion.
May 2024	Meeting	All host authority workshop.
May 2024	Meeting	EACN discussion.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline Landscape and Ecological Management Plan (LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultations
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Meeting	National Grid held a meeting to discuss comments from the second iteration of the Outline CoCP and Outline LEMP

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
January 2025	Email Correspondence	National Grid issued the second iteration of the draft Outline CoCP
January 2025	Email Correspondence	National Grid issued the draft Statement of Common Ground (SoCG)
March 2025	Meeting	Meeting to discuss the second iteration of the Outline COCP and Outline LEMP
March 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft CoCP
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline CoCP - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email Correspondence	National Grid issued the Long List of Other Developments
May 2025	Meeting	Meeting to discuss targeted consultation feedback
May 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
May 2025	Meeting	All host authority workshop
June 2025	Meeting	Meeting to discuss access arrangements around Dunton Hills Garden Village
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	Email	ECC shared their relevant representations with National Grid following submission to PINS.
November 2025	Meeting	All host authority workshop
December 2025	Meeting	Meeting to discuss Statement of Common Ground
December 2025	Meeting	Meeting to discuss change application
January 2026	Meeting	All host authority workshop

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
<b>Ecology and Biodiversity</b>		
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 ECC and other authorities.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
January 2024	Meeting	Meeting to discuss the BNG initiative.
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 surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	National Grid shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex South)
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex North)
January 2026	Meeting	Meeting to discuss Statement of Common Ground with ECC

### **Contaminated Land, Geology and Hydrogeology**

August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).

### **Health and Wellbeing (including Air Quality and Noise and Vibration)**

September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
July 2023	Technical Note	National Grid issued a technical note to Environmental Health Officers (EHOs) to agree the

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

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
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	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Essex County Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Email Correspondence	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline 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	Technical focus meeting to discuss ongoing archaeology work on site
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	National Grid shared additional trench plans for Site 009, Areas 26 and 34
June 2025	Email Correspondence	National Grid shared updated trench plans for Site 009, areas 26 and 34
June 2025	Email Correspondence	National Grid share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011, 012, 013, 014 and 015
September 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011 and 12
September 2025	Email Correspondence	National Grid shared updated SSWSIs sites 11 & 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 (Covering Essex North)
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex South and Thurrock)
October 2025	Email	National Grid shared the Trial Trench Plans for review and approval for site 009.011, and 15
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Email	National Grid shapefile for the phase 2 survey along with the priority area survey
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email	National Grid shared the WSI for the Phase 2 geophysical survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss matters relating to built heritage in the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
<b>Hydrology, Land Drainage and Flood Risk</b>		
June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.
September 2024	Technical Note	National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	National Grid issued the Draft FRA for agreement/comment
January 2025	Meeting	National Grid held a meeting to discuss comments raised from the draft FRA
March 2025	Email Correspondence	National Grid issued Draft FRA for agreement/comment
<b>Landscape and Visual</b>		
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	National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Essex. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.

Date	Format	Topic/Description
		ECC provided feedback on the viewpoints at the meeting and in subsequent correspondence.
April 2023	Meeting	National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
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.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Meeting	EACN (Statutory Consultation) Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits with ECC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape and Visual Thematic Group Meeting – LVIA Viewpoints within Essex North

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
October 2024	Meeting	National Grid held a focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated viewpoint information data following from the landscape thematic workshops
December 2024	Meeting	Meeting to agree photography locations and photomontages for the ES
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex South)
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)
October 2025	Meeting	Follow up optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)
January 2026	Meeting	Joint meeting attended by LPA's who are represented by EPS 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 ECC.
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.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
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.
March 2025	Email Correspondence	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the Socio Economics, Recreation and Tourism section of the Environmental Statement (Covering Essex South)

### **Traffic and Transport**

June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.
June 2023	Meeting	National Grid held a meeting to discuss the EACN Substation access arrangements with ECC and National Highways.
August 2023	Meeting	National Grid held a Transport Working Group to discuss the highways assessment and methodology,

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
		survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities (including ECC).
November 2023	Meeting	National Grid held a PRow Thematic Group Meeting.
January 2024	Meeting	National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) at the Transport Working Group.
March 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities.
June 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management.
June 2024	Meeting	Meeting to discuss EACN and interaction with North Falls and Five Estuaries wind farm projects, and the proposed Norwich to Tilbury EACN permanent access between Bentley Road and Ardleigh road that would be required.
July 2024	Email Correspondence	Proposed Abnormal Indivisible Load (AIL) Routes issued for comment.
July 2024	Email Correspondence	ECC 2024 statutory consultation response received.
August 2024	Meeting	National Grid held a Transport Working Group LHA engagement meeting with ECC. Highway mitigation on PARS from 2024 statutory consultation were presented.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
September 2024	Meeting	National Grid held a Transport Working Group Meeting with ECC and National Highways to discuss AIL routes. Overview of AIL vehicles provided.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. All affected LHAs were in attendance. Highways Mitigation Design, schedules of works and proposed structure of CWTP were discussed. Confirmation given that ProW surveys and crossover bellmouth RSAs had been scheduled in.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. All affected LHAs were in attendance. Topics discussed included AILs, highway mitigation design, transport planning and multi-modal report.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of TA was presented and an overview provided of the initial capacity assessment methodology.
December 2024	Meeting	National Grid held a LHA Engagement Meeting to discuss potential changes following S42 statutory consultation, visibility splays and traffic management methodology, access for existing utilities and AILs.
January 2025	Meeting	National Grid held a Transport Working Group Meeting. Presented work in progress draft of Transport Assessment. Ran through methodology of junction sifting process, junction assessment methodology and cumulative assessment.
February 2025	Meeting	National Grid held a Transport Working Group Regional. Presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised.
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy.
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures.
March 2025	Meeting	Meeting to run through TA report and comments provided by ECC on their initial review.
March 2025	Meeting	National Grid held a Highway Mitigation Workshop with National Highways to discuss the A12 and A120 junctions in Essex.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
April 2025	Meeting	National Grid held a meeting to discuss the AIL process and report with ECC, Essex and Suffolk police.
April 2025	Meeting	National Grid held a Traffic and Transport Working Group Meeting. Section 42 targeted consultations closed. Latest updates given relating to engagement on AILS, PROWS and highways modelling.
June 2025	Meeting	National Grid held a Regional Stakeholder Meeting with ECC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	National Grid held a workshop to discuss the methodology utilised to produce the construction trip generation with ECC.
August 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
October 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
November 2025	Meeting	Mott MacDonald held a meeting on behalf of National Grid to discuss Essex County Council's comments on Road Safety Audits and Highway Mitigation.
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the Traffic, Transport and ProW sections of the Environmental Statement
December 2025	Meeting	National Grid held a Traffic and Transport Working Group Meeting
January 2026	Meeting	National Grid held a meeting with Essex County Council to discuss the informal consultation comments provided by ECC.
January 2026	Meeting	National Grid held a meeting with Essex County Council to discuss Statements of Common Ground and to review their updated comments.

# 3. Matters Agreed, Not Agreed or Under Discussion

## 3.1 Overview

- 3.1.1 This chapter details the matters relevant to ECC 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 ECC. 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 3.3 to Table 3.15 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	Essex County Council's Position	Status
<b>Strategic options/needs case</b>				
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>National Grid's position regarding the integrated offshore solution mentioned by ECC is covered under 'onshore' below (ID 3.2.3).</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and Alternatives (RR-1083). ECC accepts that network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted / planned electricity generation in the East Anglia region. However, despite the acceptance of the need, ECC's in-principle objection continues to be for an integrated offshore solution that avoids the use of overhead powerlines due to their impact on communities and the environment. ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p> <p>ECC's 'In Principle Strategic Objection' is detailed within it's LIR.</p>	Under discussion
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</p>	<p>ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner Licence) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Annex 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><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>Alternatives (RR-1083). ECC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While ECC has had regard to the TEC Register, ECC considers it essential that in determining what future expansion is needed, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Applicant must not restrict the justification on future network expansion solely based on the ESO contracted position. Further engagement would be welcomed on this matter.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p> <p>ECC's 'In Principle Strategic Objection' is detailed within it's LIR.</p>	
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>ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and Alternatives (RR-1083). ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><a href="#">Updated Strategic Options and Backcheck Review documents</a></p> <p>published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.</p> <p>The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts including landscape and visual impacts. If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding). This is to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme, and if so, put them forward at pace to achieve the required network reinforcement instead of the submitted scheme. Further discussion would be welcomed on this matter.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p> <p>ECC's 'In Principle Strategic Objection' is detailed within it's LIR.</p>	
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which	ECC would refer to it's Relevant Representation submission (27 November	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>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><a href="#">Updated Strategic Options and Backcheck Review documents</a> 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 bills.</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>2025), section 4 – Project Need Case and Alternatives (RR-1083). ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.</p> <p>Localised design responses involving undergrounding and /or alternate pylon design as part of the application of the mitigation hierarchy, should not be discounted by NG. The County Council consider such an approach would not be contrary to national policy statements and would actually be consistent with Holford Rule 7 where it states projects should be routed to minimise as far as possible effects on development.</p> <p>ECC contends that insufficient weight has been to the effects of development on existing and / or planned development as well as broader strategic objectives to deliver new homes, to inform more appropriate localised design responses.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ECC's 'In Principle Strategic Objection' is detailed within it's LIR.	
3.2.5	Policy compliance	<p>In deciding an application for development consent Section 104 of the Planning Act 2008 requires the Secretary of State to determine the application in accordance with any relevant National Policy Statement (NPS). The NPSs relevant to this project are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) which came into force in January 2024. The National Policy Statement for Renewable Energy (EN-3 2024) also includes support for the onshore infrastructure required to deliver new offshore wind developments.</p> <p>Norwich to Tilbury has been developed in line with these National Planning Policies, and more information can be found in the <a href="#">2024 Design Development Report [APP-359]</a> and 2025 Design Development Report [APP-122].</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>ECC sought legal advice in confirming that there is presumption in favour of approving an NPS compliant scheme and that the SoS must determine a DCO application in accordance with the relevant NPS, unless one of a range of specified exceptions applies. The advice did however acknowledge that a decision can be made other than in accordance with the NPS and in accordance with S104(7) of the Planning Act 2008, where the adverse impact and of the proposed development would outweigh its benefits of the project.</p> <p>In so doing, the advice clarified the importance of clear robust evidence to support any identified harm, if the ExA and/or the Secretary of State are to be in a position to give consideration to an argument that the adverse impacts of the scheme outweigh the benefits, or that the residual impacts after mitigation has been applied render the circumstances truly exceptional, whereby consent could be refused or the scheme modified, with no breach of the relevant statutory or policy requirements.</p> <p>The advice also confirmed that weight is to be applied to local plan policy and strategic designations and when the projects critical national priority (CNP) status is applied in the overall decision-making process.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>				
<p><b>Project development process – Design</b></p>				
3.2.6	Dunton Hills Garden Village	<p>National Grid has taken into account the potential effect of its proposals when developing the route alignment. In this location we have to work within the context of the planning status of other projects, including the Dunton Hills Garden Village proposals.</p> <p>National Grid has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5.</p> <p>The 2024 Design Development Report (<b>APP-359</b>) identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed master planning, would substantially mitigate potential</p>	<p>ECC would refer to it's Relevant Representation submission (27 November 2025), section 6.2 Dunton Hills Garden Village (RR-1083). Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. The County Council therefore maintains this will degrade the principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery.</p> <p>Given the current housing need within Basildon / Brentwood and across the region, the importance of this development in terms of numbers and infrastructure being delivered, this situation is not acceptable to ECC.</p> <p>ECC is seeking alternative design solutions and / or mitigation along this section of the proposed route to avoid any impact on housing numbers, viability, infrastructure, design principles and delivery. Further discussion on this matter would be welcomed.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>effects on developable land and indirect effects.</p> <p>National Grid will continue to engage with ECC on this matter.</p>		
3.2.7	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>Furthermore, NPS EN-1 encourages developers "Applying good design to</p>	<p>ECC would refer to it's Relevant Representation submission (27 November 2025), section 6.4 Design (RR-1083). The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. 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. In particular, it is noted the advice states "Good design is crucial for achieving excellent functionality, sustainability, positive place-making and resilience in NSIPs".</p> <p>The Council feels there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. It is supportive of the concerns raised by Tending District Council regarding the impact of the proposed infrastructure on the environment around</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>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 [APP-353].</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>Ardleigh. ECC expects to see the Applicant working alongside the promoters of North Falls (EN010119), Five Estuaries (EN010115) and Tarchon Interconnector, to ensure a joined up approach in the design of the infrastructure located in Ardleigh, and would expect engagement in any design review processes.</p> <p>ECC would wish to see commitments around the issue of design informing the draft DCO / Schedule of Requirements. NGET must follow a good design process to ensuring that the infrastructure proposed remains functional and safe while giving sufficient consideration to and realising the best local design and environmental outcomes for the project.</p> <p>Further discussion on this topic matter would be welcomed.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	
<b>Project development process - Consultation</b>				
3.2.8	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the <a href="#">Consultation Strategy</a> , and responses	ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>to feedback received during consultation are included in the <a href="#">Feedback Report</a>.</p> <p>The non-statutory consultation was undertaken in accordance with the published <a href="#">Consultation Strategy</a>.</p>	<p>ECC refers to its response to this consultation dated 16<sup>th</sup> June 2022.</p>	
3.2.9	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 <a href="#">Consultation Strategy</a>, and responses to feedback received during consultation are included in the <a href="#">Feedback Report</a>.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	<p>ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy</p> <p>ECC refers to its response to this consultation dated 14th August 2023.</p>	Under Discussion
3.2.10	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 <a href="#">Statement of Community Consultation (SoCC)</a>. Responses to feedback received during statutory consultation are contained within the Consultation Feedback Report <b>[APP-066]</b>.</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>	<p>ECC acknowledges the nonstatutory consultation was undertaken in accordance with the Statement of Community Consultation.</p> <p>ECC refers to its response to this consultation dated 26<sup>th</sup> July 2024 .</p>	Under Discussion
3.2.11	2025 targeted consultation	<p>Targeted consultations for Essex took place from 25 February - 27 March 2025. Details of these consultations are outlined in the <a href="#">Targeted Consultation Strategy</a> and associated targeted consultation leaflets and environmental implications of change</p>	<p>ECC acknowledges the non-statutory consultation was undertaken in accordance with the Targeted Consultation Strategy</p> <p>ECC refers to its response to this consultation dated 15 April 2025 .</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>documents. Responses to feedback received during targeted consultation are contained within the Consultation Feedback Report [APP-066].</p> <p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. 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>ECC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process including the lack of feedback to the statutory consultation undertaken in summer 2024 and which informed the scope of the targeted consultation, was considered harmful to the transparency and legitimacy of the process.</p> <p>It is also felt that some changes to the scheme may not be the most significant and are considered to be non-material, ECC 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> <p>ECC would refer to it's Adequacy of Consultation submission (AoC-009) and it's Relevant Representation submission (27 November 2025), section 2 ECC's Pre-application Engagement with the Applicant (RR-1083).</p> <p>National Grid must implement an effective and open engagement process through this Pre-Examination and Examination stage to ensure all those participating in the process feel adequately informed</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>Other matters as required</b>				
3.2.12	Community benefits	<p><b>Updated position (February 2026):</b> Socio-economic impacts on the local economy and the tourism sector are assessed in <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b>. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.</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</p>	<p>ECC Response to Targeted Consultations (15/04/2025):</p> <p>ECC considered 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 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> <p>ECC strongly encourage NGET to respond positively to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024 particularly having regard to the Governments recently published Community Funds for Transmission Infrastructure.</p> <p>In particular, significant benefits should be realised from N2T for education, skills, and employment during construction and operation, alone and cumulatively with other NSIPs.</p> <p>With reference to ECC's Relevant Representation submission (27 November 2025), section 2 ECC's Pre-application Engagement with the Applicant (RR-1083) there has been little progress from National Grid on this matter.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>(DESNZ, 2025)<sup>14</sup>. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA. National Grid will continue to engage with ECC on this matter.</p>	<p>It is considered that this will be a key area of disagreement unless clarity is provided as soon as practically possible.</p> <p>Further discussion would be welcomed on this topic</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</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	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.3.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 8.2 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>.</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. EPS confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed
<b>EIA – Approach and Methods</b>				
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 <b>Section 8.4 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>.</p> <p><b>Updated position (February 2026):</b> 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 <b>[AS-026 to AS-45]</b>.</p>	<p>Sufficient desktop data has been collected for the ES.</p> <p>EPS 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 ID 3.3.18.</p>	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.3.4	Assessment Methodology	<p>National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p>All methodologies for surveying licensable species, including water voles have been agreed with Natural England.</p>	<p>The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.3.5	Survey Methodology	<p>National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p>All methodologies for surveying licensable species have been agreed with Natural England.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>The survey methods used are largely accepted, although note the comments made for ID 3.3.11.</p> <p>EPS 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.</p>	Agreed
3.3.6	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in <b>Section 8.4 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b></p> <p>National Grid has committed to a 5-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for DCO projects of</p>	<p>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 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</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>this scale. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the 7.1 Biodiversity Net Gain Report <b>[APP-299]</b>. National Grid await further response from ECC on requirements.</p>	<p>reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement.</p> <p>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under further review and that ECC will provide further comment following consideration around reinstatement.</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	

#### EIA – Baseline Conditions

3.3.7	Baseline conditions and receptors	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in <b>Section 8.5 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b></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>ECC 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.</p>	Agreed
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ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
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 <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. 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.</p> <p>ECC 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 <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Draft LEMP documents have been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions to those documents.</p> <p>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID 3.3.21.</p>	Agreed
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. 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 3.3.21).</p> <p>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Assessment Conclusions</b>				
3.3.11	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 8.7 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b></p> <p>Table 8.23 and 8.24 within biodiversity chapter 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 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</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. 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>ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction 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</i></p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</p>	<p>after further survey] <i>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 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</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>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 for roosting bats (i.e. getting DCO without first completing surveys), when ECC is not aware of any such DLL method for bats having been trialled and approved.</p> <p>ECC 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	The assessment of effects during operation (and maintenance) is presented in <b>Section 8.7 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) is considered appropriate. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.3.13	Outline CoCP	<p>The Outline CoCP <b>[APP-300]</b> includes all relevant construction related mitigation measures specified in <b>Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the Outline CoCP <b>[APP-300]</b>. A meeting was held in March</p>	<p>The Outline CoCP has been shared with ECC. ECC 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, ECC</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated position (February 2026):</b></p> <p>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>would welcome a commitment as to the minimum 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.</p> <p>ECC 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 EcoWs.</p>	
3.3.14	Outline LEMP	<p>The Outline LEMP [AS-046] includes all relevant operational related mitigation measures specified in <b>Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES</b> [AS-026] and is appropriate.</p> <p>Meeting held in October to agree on the structure for the Outline LEMP [AS-046].</p> <p>Meeting held in March 2025 to discuss the second iteration of the <b>Outline LEMP [AS-046]</b>.</p>	<p>The Outline LEMP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19<sup>th</sup> 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 sought? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>A further iteration of the <b>Outline LEMP [AS-046]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated position (February 2026):</b></p> <p>Natural England (the statutory responsible body for bats) has 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 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>hibernation criteria exclude certain PRF-I and PRF-M features?</p> <p>ECC 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	Essex County Council's Position	Status
<b>Other matters as required</b>				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The 7.1 Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.</p> <p>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	ECC would like this matter to remain under discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved.	Under discussion
3.3.16	Biodiversity Net Gain (BNG) - Offsite	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The 7.1 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> <p>National Grid will continue to engage with ECC on this matter.</p>	ECC 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	Arboriculture Impact Assessment (AIA)	<p>National Grid issued the draft AIA in March 2025.</p> <p>No comments received to date on the AIA from ECC.</p>		Under discussion
3.3.18	Data sources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 8.4 of Chapter 8</b>	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	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>(Ecology and Biodiversity) of the ES [AS-026].</p> <p><b>Updated position (February 2026):</b></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>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 position pending.</p>	
3.3.19	Survey Methodology (Bats)	<p>National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p>All methodologies for surveying licensable species have been agreed with Natural England.</p> <p><b>Updated position (February 2026):</b></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.</p>	<p>Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECC 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 a more confidently proportionate mitigation/compensation scheme.</p>	Under discussion
3.3.20	Baseline conditions and receptors (Bats)	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in <b>Section 8.5 of Chapter 8 (Ecology and Biodiversity)</b> of the ES [AS-026]. The baseline conditions and receptors presented are considered appropriate.</p>	<p>ECC 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.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Updated position (February 2026):</b></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.</p>		
3.3.21	Standard mitigation (Bats)	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b></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 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. National Grid will continue to engage with ECC on this matter.</p>	<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. ECC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11.</p> <p>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for bats requires further information and review.</p>	Under discussion

## 3.4 Green Infrastructure

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>Ecology and Biodiversity Matters</b>				
3.4.1	Data sources (Ecology Matters)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 8.4 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>In respect of Green Infrastructure matters: The Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study to inform the identification of existing habitats and to guide the selection of appropriate locations for mitigation and compensation measures. It provides a spatial framework for identifying opportunities to enhance biodiversity and deliver nature recovery across Essex. Including LNRS mapping ensures alignment with national policy objectives and supports coordinated, cross-boundary environmental planning that reflects local priorities and ecological networks.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with very limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	Under discussion
3.4.2	Standard mitigation	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> and set</p>	<p>In respect of Green Infrastructure: ECC welcomes the inclusion of embedded and standard mitigation measures within the Outline LEMP and CoCP. However, ECC would encourage National Grid to further</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>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>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>integrate GI principles within the mitigation hierarchy, ensuring that ecological, hydrological, and landscape functions are delivered in an integrated manner. GI should be designed to provide multifunctional benefits, such as flood mitigation, biodiversity enhancement, and community wellbeing (PRoW) are maximised across the route where possible.</p> <p>ECC would recommend that GI corridors be aligned with existing ecological networks and PRoW to enhance connectivity and accessibility, particularly in areas of landscape sensitivity and community use.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with very little time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	
3.4.3	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 8.6 of Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. <b>Document 7.1 Biodiversity Net Gain Report [APP-299]</b> highlights that the Order Limit Hedgerows are to be enhanced to meet the minimum net gain requirement (+10 %), including native species as highlighted in 7.1 Outline LEMP [APP-041].</p>	<p>In respect of Green Infrastructure: GI delivery should be explicitly aligned with the Essex GI Strategy and Essex GI Standards and reflect the priorities identified in the Essex LNRS, ensuring that mitigation and enhancement measures contribute to wider landscape-scale recovery.</p> <p>Where habitats such as hedgerows and trees are removed, they should be reinstated with enhanced hedgerow habitats using locally important native species and local seed stock, in consultation with wildlife groups across Essex.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>7.1 Biodiversity Net Gain <b>Report [APP-299]</b> confirms that National Grid will consider Local Nature Recovery Strategy areas as part of the offsite BNG selection process where sites are available and appropriate to project circumstances. National Grid also aims to deliver biodiversity legacy within the three counties crossed by the Project (Norfolk, Suffolk and Essex).</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>ECC recommends that discussions be held to secure off-site biodiversity compensation within Essex, with a preference for delivery within strategic habitat opportunity areas identified in the Essex LNRS. To ensure long-term ecological benefits, ECC also encourages the establishment of stewardship agreements with local wildlife groups such as Essex Wildlife Trust, ECC, Place Services, and relevant Local Authorities.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	
3.4.4	Outline LEMP	<p>The Outline LEMP includes all relevant operational related mitigation measures specified in <b>Chapter 8 (Ecology and Biodiversity)</b> of the <b>ES [AS-026]</b> and is appropriate.</p> <p>National Grid has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. Detail on habitat management and monitoring for the Environmental Areas will be set out in the final Landscape and Ecological Management Plan post consent.</p>	<p>In respect of Green Infrastructure: ECC requests clarity on the governance and long-term monitoring arrangements for BNG delivery. ECC recommends that the Outline LEMP include a robust monitoring framework with adaptive management provisions and opportunities for stakeholder engagement to ensure the longevity and effectiveness of BNG measures.</p> <p>While HMMP and LEMP are standalone documents ECC recommend that the BNG delivery be cross referenced within the Outline LEMP and supported by a clear monitoring framework, including adaptive management provisions and community engagement.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>A meeting was held in October to agree on the structure for the <b>Outline LEMP [AS-046]</b>.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the <b>Outline LEMP [AS-046]</b>.</p> <p>A further iteration of the <b>Outline LEMP [AS-046]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>ECC recommends extending the monitoring period for landscape (GI) delivery to 10 years, in line with best practice demonstrated by other NSIPs (e.g. Five Estuaries and North Falls Offshore Wind Farms), and a 30-year management period for BNG/GI associated with EACN and substation landscape plans. The proposed 10-year monitoring period could be structured into two phases: an initial 5-year period of high-frequency establishment monitoring, followed by a subsequent 5-year period of lower-frequency development monitoring</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	
3.4.5	Biodiversity Net Gain (BNG)	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers.</p> <p>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025. <b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>In respect of Green Infrastructure: ECC supports the commitment to deliver at least 10% BNG. The Essex Local Nature Partnership (including LPAs) are working towards a joint approach to BNG, including potential joint specific measurable targets (20% BNG). It is recommended that National Grid consider adopting a higher figure than the minimum 10% requirement within the Environment Act (2021). ECC and the Essex Local Nature Partnership has published its `Viability Assessment of Biodiversity Net Gain in Essex, February</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		National Grid will continue to engage with ECC on this matter.	<p>2025'. The viability assessments demonstrate that a 20% BNG is achievable and viable and meets the NPPF requirements, which emphasises measurable net gains for biodiversity. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum.</p> <p>ECC would encourage National Grid to ensure that BNG delivery is spatially aligned with Essex Local Nature Recovery Strategy (LNRS), ensuring that habitat creation and enhancement contribute to strategic ecological networks and priority areas identified within the LNRS.</p> <p>ECC would recommend that offsite BNG proposals be co-developed with local stakeholders and LNRS delivery partners to ensure strategic alignment and long-term ecological value.</p> <p>Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions.</p> <p>Transparent accounting is required to distinguish between mitigation, enhancement, and compensation to avoid double-counting BNG.</p> <p>Planning applications subject to mandatory BNG shall require a Habitat Management and Monitoring Plan to be submitted to and approved in writing by the local planning authority. To ensure that the net gain in</p>	

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<p>biodiversity agreed upon in the Biodiversity Net Gain Plan shall be implemented in full within a 30-year period.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>				
<p><b>Landscape and Visual</b></p>				
3.4.6	Embedded mitigation (Landscape and Visual)	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in <b>Section 13.6 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>In respect of Green Infrastructure: ECC recommends that Green Infrastructure be used as a key component of landscape mitigation, particularly in areas of high visual sensitivity and community use. ECC supports the use of planting and habitat creation to soften visual impacts and enhance landscape character, and requests that GI proposals be aligned with LNRS priorities and local landscape strategies.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	Under discussion
3.4.7	Additional mitigation	The consideration of additional mitigation measures are presented in <b>Section 13.6</b> of	In respect of Green Infrastructure: ECC notes that significant residual landscape and	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
	(Landscape and Visual)	<p><b>Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>visual impacts remain. ECC recommends that National Grid explore a range of compensation measures to offset the impacts of the proposal and deliver net environmental gain. These should include the enhancement of existing GI assets, investment in community-led landscape initiatives, and the creation of new accessible, high-quality GI open spaces across Essex. Such measures would contribute to improved environmental outcomes and support the wider objectives of nature recovery and community wellbeing. Discussions have taken place with Place Services, Essex Wildlife Trust, the Biodiversity Net Gain (BNG) Officer, and the Local Nature Recovery Strategy (LNRS) Coordinator to explore opportunities for securing potential compensation measures and financial contribution within Essex. ECC recommends securing off-site compensation within Essex, ideally in LNRS strategic habitat opportunity areas, and establishing long-term stewardship agreements with wildlife groups across Essex such as Essex Wildlife Trust, and ECC and other Local Authorities.</p> <p>As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.4.8	Outline LEMP (Landscape and Visual)	<p>The <b>Outline LEMP [AS-046]</b> includes all relevant operational related mitigation measures specified in <b>Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the <b>Outline LEMP [AS-046]</b>.</p> <p>Meeting held in March 2025 to discuss the second iteration of the <b>Outline LEMP [AS-046]</b>.</p> <p>A further iteration of the <b>Outline LEMP [AS-046]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from “enhanced mitigation” to “landscape compensation” require clarification to ensure these are not repurposed mitigation measures, risking double-counting.</p> <p>ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence.</p> <p>ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.</p> <p>As ECC only had sight of NGET’s position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET’s statement at Deadline 4 of the Examination.</p>	Under discussion

### 3.5 Contaminated Land, Geology and Hydrogeology

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.5.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 9.2 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><b>Updated position (February 2026):</b></p> <p>Further discussion will take place following review of the Local Impact Report (LIR). National Grid will continue to engage with ECC on this matter.</p>	No comments raised in the ECC relevant representations in relation to the policy legislation around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.	Under discussion
<b>EIA – Approach and Methods</b>				
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.	Agreed
3.5.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 9.4 of Chapter 9</b>	No comments raised in the ECC relevant representations in relation to the data sources around Hydrogeology, Geology and Contaminated Land. It is noted that further	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>(Contaminated Land, of the Geology and Hydrogeology) ES [APP-181].</b></p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>specific detail will be contained in the local impact report.</p>	
3.5.4	Assessment methodology	<p>The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>ECC confirmed on 17 October in the review of the Statement of Common Ground that this matter has been appropriately dealt with therefore the status has been changed to agreed.</p>	Agreed
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in <b>Section 9.4 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>No comments raised in the ECC relevant representations in relation to the Key Parameter and assumptions around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Baseline Conditions</b>				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in <b>Section 9.5 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>No comments raised in the ECC relevant representations in relation to the baseline conditions and receptors for Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.</p>	Under discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.5.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in <b>Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>No comments raised in the ECC relevant representations in relation to embedded mitigation for Hydrogeology, Geology and Contaminated Land. It is noted that further specific detail will be contained in the local impact report.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.5.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in <b>Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>No comments raised in the ECC relevant representations in relation to the standard mitigation around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.</p>	Under discussion
3.5.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>No comments raised in the ECC relevant representations in relation to the additional mitigation around Hydrogeology, Geology and Contaminated Land. It is noted that further specific detail will be contained in the local impact report.</p>	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.5.10	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 9.7 of</b></p>	<p>No comments raised in the ECC relevant representations in relation to the</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>construction effects around Hydrogeology, Geology and Contaminated Land. It is noted that further specific detail will be contained in the local impact report.</p>	
3.5.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>National Grid has considered these potential future mineral extraction sites as part of project development, including a revised design following consultation. This is addressed in the <b>2025 Design Development Report [APP-122]</b>, para 6.5.31.</p> <p><b>Updated position (February 2026):</b> 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 will continue to engage with ECC and the site operator as appropriate.</p>	<p>ECC provided the following details in their relevant representations dated 27<sup>th</sup> November 2025:</p> <ul style="list-style-type: none"> <li>From the evidence supporting the application, it is the case that the Applicant is relying on future conversations with existing and potential future mineral site operators to fully address operational matters. Of particular note with respect to Candidate Sites for potential future mineral extraction, Candidate Sites A85 and A86 are currently being assessed for future allocation as part of the ongoing Review into the Essex MLP. These sites are being promoted as an extension to an existing silica sand and sand and gravel mineral site. Silica sand is a rare and more valuable resource than 'standard' sand and it is from the part of the county represented by the proposed site extensions A85 and A86 where the only</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>deposits of this mineral have been found. Whilst the recognition of impact on this nationally important (from the Mineral Products Associates (Industrial Sand) "It is recognised by government as an essential raw material of national importance and as such there is a requirement to provide an adequate and steady supply, through maintaining stocks of permitted reserves and safeguarding silica sand resources") resource is welcomed, it is not explicitly stated whether the Candidate Sites are now effectively sterilised and therefore additional work will be required with the site promoters to understand whether the sites are still capable of being delivered as part of the emerging MLP (or otherwise) should the MWPA, following assessment, be minded to allocate either site as a Preferred Site</p> <ul style="list-style-type: none"> <li>• ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</li> </ul>	

**Draft DCO / Outline Management Plans / Mitigation and Monitoring**

3.5.12	Outline CoCP	<p>The Outline CoCP <b>[APP-300]</b> includes all relevant construction mitigation measures specified in <b>Chapter 9 (Contaminated Land, Geology and Hydrogeology)</b> of the <b>ES [APP-181]</b> and is appropriate for managing construction impacts from the Project.</p>	<p>No comments raised in the ECC relevant representations in relation to the Outline CoCP around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific</p>	Under discussion
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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>A meeting was held in October 2024 to agree on the structure for the <b>Outline CoCP [APP-300]</b>.A meeting was held in March 2025 to discuss the second iteration of the <b>Outline CoCP [APP-300]</b>.</p> <p>A further iteration of the <b>Outline CoCP [APP-300]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated position (February 2026):</b></p> <p>Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>detail will be contained in the local impact report.</p>	

Other matters as required

## 3.6 Health and Wellbeing

3.6.1 In relation to air quality and noise and vibration, ECC confirmed that the expertise for these topics sits with district and borough Environmental Protection / Health Officers, therefore are not included here.

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 10.2 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><b>Updated position (February 2026):</b></p> <p>Key regional and local policy relevant to health and wellbeing has informed the Health and Wellbeing assessment found in <b>ES Chapter 10 – Health and Wellbeing [APP-192]</b>. This includes the Joint Strategic Needs Assessments (JSNAs) and health and wellbeing strategies prepared by local authorities to identify local health priorities. The Essex Joint Health and Wellbeing Strategy is amongst those listed in Table 10.1 of <b>ES Chapter 10 (Health and Wellbeing) [APP-192]</b>. Health priorities common across local health and wellbeing</p>	<p>Health and Wellbeing Chapter: Section 10.2 of Chapter 10 of the PEIR states that local policy, specific to Health and Wellbeing will include local authorities and Integrated Care Boards Joint Strategic Needs Assessments (JSNA) and Health and Wellbeing Strategies.</p> <p>Reference to the Southend, Essex and Thurrock Mental Health Strategy should also be considered in the policy context linking into assessment of mental health impacts.</p> <p>As part of the Statutory Consultation, ECC Public Health response to the PEIR, reference to the localised health and wellbeing strategies is also recommended.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>Table 10.1 (APP-192) of the ES omits reference to local health and wellbeing strategies and Integrated Care System Joint Forward Plans. This weakens alignment with local policy objectives and</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		strategies reviewed include tackling health inequalities, supporting mental wellbeing and enabling healthier, more active communities, as demonstrated in Table 10.1 of <b>ES Chapter 10 (Health and Wellbeing) [APP-192]</b> .	<p>the Essex Joint Health and Wellbeing Strategy, which focus on tackling inequalities, supporting mental wellbeing and enabling healthier, more active communities</p> <ul style="list-style-type: none"> <li>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
<b>EIA – Approach and Methods</b>				
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 desktop data has been collected to inform the assessment as presented within <b>Section 10.4 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>. National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024.</p> <p>ECC response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025. National Grid can confirm that the baseline section of the ES chapter includes reference to the Index of Multiple Deprivation (IMD). The approach to defining ward sensitivity has used a</p>	<p>Health and Wellbeing Chapter:</p> <p>An additional technical note for health and wellbeing (November 2024) refreshed approach has been produced and should be referenced here.</p> <p>Clarification is required on use of 'Indices of Deprivation', will this look at the overall measure of deprivation along the route or will it focus domains of deprivation as part of defining sensitivity.</p> <p>ECC confirmed in an email dated 30 January 2026 from the public health team that this matter has been resolved and the position can be agreed.</p>	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>variety of baseline data, including the IMD but also other health-related indicators.</p> <p>National Grid can confirm that published local position statements such as the Essex Joint Health and Wellbeing Strategy have been included within the <b>Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>.</p>		
3.6.4	Assessment methodology	<p>A meeting was held on 24 September 2024 to agree the assessment methodology of <b>Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>.</p> <p>Comments were received on the Technical Note from ECC on 01/11/2024 and a response was provided in May 2025.</p> <p><b>Updated position (February 2026):</b></p> <p>Comments made by ECC in their relevant representation are noted, and National Grid will continue to engage with ECC on this matter. National Grid's position to each of the points raised is as follows:</p> <ul style="list-style-type: none"> <li>• A cumulative assessment is provided in Environmental Statement <b>Chapter 17 - Cumulative Effects [APP-281]</b>. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example</li> </ul>	<p>As part of the Statutory Consultation, ECC Public Health highlighted the need for a more robust health impact assessment and the need for National Grid to focus on actively driving out maximum local benefits to the health and wellbeing of communities across Essex.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• The overarching National Policy Statement for Energy (EN-1) requires that Environmental Statements identify and mitigate adverse health impacts arising from energy infrastructure, including cumulative effects and impacts on vulnerable groups. It also expects applicants to consider indirect health impacts such as access to open space, active travel and community wellbeing. ECC considers that the ES does not yet meet these expectations. The Health and Wellbeing chapter (APP-192) does not</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.</p> <ul style="list-style-type: none"> <li>• <b>ES Chapter 10 - Health and Wellbeing [APP-192]</b> contains an assessment of impacts on vulnerable groups. Vulnerable groups considered in the assessment are identified in Table 10.5 of <b>ES Chapter 10 - Health and Wellbeing [APP-192]</b>.</li> </ul> <p>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>provide any view on cumulative health effects as required under EN-1.</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p> <ul style="list-style-type: none"> <li>• ECC has not had sight of the National Grid's deadline 1 response so is unable to respond.</li> </ul>	
3.6.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in <b>Section 10.4 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024.</p> <p>ECC response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p>	<p>Key parameters presented in the PEIR are considered appropriate at a population level, consideration of vulnerable groups and the application of a precautionary principle.</p> <p>As with the revised health and wellbeing approach, use of the Welsh Health Impact Assessment Support Unit (WHIASU) guidance is recommended to inform the identification of vulnerable population groups is recommended. The refreshed approach to Health and Wellbeing should be referenced here.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Updated position (February 2026):</b>In relation to the points raised in ECC's relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The assessment undertaken in <b>Chapter 10: Health and Wellbeing</b> of the <b>ES (6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192])</b> reported the available IMD data at the time (i.e. 2019) in order to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. We have also reviewed deprivation data for the health deprivation and disability domain at LSOA level, as set out in paragraph 10.5.18 of Chapter 10. A review of the updated IMD data published in October 2025 (after the DCO application was submitted) shows that, for Greater Essex, more people are living in deprived areas in 2025 than was the case in 2019 (although for some areas such as Colchester, deprivation levels do not appear to have changed significantly over the same time period). It is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment; impacts on vulnerable populations (which includes people both within and outside of</li> </ul>	<ul style="list-style-type: none"> <li>The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently.</li> <li>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		deprived areas) have already been taken into account in the assessment.		
<b>EIA – Baseline Conditions</b>				
3.6.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in <b>Section 10.5 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated position (February 2026):</b></p> <p>In relation to points raised in ECC's relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• The point relating to IMD data has been addressed earlier in relation to ID3.5.5 and is not repeated here.</li> <li>• The point relating to the Joint Health and Wellbeing Strategy has been addressed earlier in relation to ID3.5.1 and is not repeated here.</li> </ul>	<p>The key information sources outlined in section 10.5.4 are considered appropriate.</p> <p>Use of IEMA guidance on determining significance for Human Health and Effective Scoping of Human Health in EIA.</p> <p>The additional guidance noted in the refreshed technical note for health and wellbeing, Welsh Health Impact Assessment Support Unit (WHIASU) is considered to be an appropriate approach for the identification of vulnerable groups is considered appropriate.</p> <p>Use of the Mental Wellbeing Impact Assessment is considered an appropriate approach for assessing the impacts on people's mental wellbeing in relation to control, resilience and community assets and participation and inclusion in the context of the wider determinants of mental well-being, ensuring this also links to the above population characteristics and sensitive receptors as outlined above.</p> <p>ECC requests whether there is any updated guidance as the above mentioned is from 2011.</p> <p>ECC requests that NG refer to the Southend, Essex and Thurrock Mental Health Strategy.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area (“LSOA”) information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently. 6.8.6.</li> <li>Table 10.1 (APP-192) of the ES omits reference to local health and wellbeing strategies and Integrated Care System Joint Forward Plans. This weakens alignment with local policy objectives and the Essex Joint Health and Wellbeing Strategy, which focus on tackling inequalities, supporting mental wellbeing</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>and enabling healthier, more active communities.</p> <ul style="list-style-type: none"> <li>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.6.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in <b>Section 10.6 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> In relation to points raised in ECC's relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>No significant health and wellbeing impacts have been identified in the assessment set out in ES Chapter 10: Health and Wellbeing <b>[APP-192]</b> and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought</li> </ul>	<p>Embedded measures relevant to the Health and Wellbeing Chapter which are intrinsic to and build into the design of the project are considered appropriate and adequate. However, will need to account of and be informed by full ES which includes the refreshed approach to Health and Wellbeing Assessment.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through making timely design decisions and engaging with the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through the use of a dedicated project phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.</p> <p><a href="#">Refer</a> to our Relevant Representation dated 27 November 2025 (RR-1083)</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.6.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in <b>Section 10.6 of Chapter 10 (Health and Wellbeing), of the ES [APP-192]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Standard mitigation measures relevant to health and wellbeing are considered appropriate and adequate to address potential effects, however, will need to take account of and be informed by the baseline conditions, mental health impact assessment as noted above in the ES.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The ES concludes that no additional mitigation is required beyond embedded</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Updated position (February 2026):</b> In relation to points raised in ECC's relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The point relating to health and wellbeing monitoring has been addressed earlier in relation to ID3.5.7 and is not repeated here.</li> </ul> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.</p> <ul style="list-style-type: none"> <li>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
3.6.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 10.6 of Chapter 10 (Health and Wellbeing)</b>, of the <b>ES [APP-192]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p>	<p><b>Health and Wellbeing Chapter:</b> It is noted that the PEIR has not identified any requirements for additional mitigation for Health and Wellbeing at this stage, this should be revisited once the above refreshed health and wellbeing assessment approach is undertaken within the ES, including the Mental Health Impact Assessment approach that will seek to</p>	Under discussion

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**Updated position (February 2026):**

In relation to points raised in ECC's relevant representation dated 27 November 2025:

- The point relating to IMD data has been addressed earlier in relation to ID3.5.7 and is not repeated here.

assess the mental health impacts according to the four protective factors; enhancing control, increasing resilience, facilitating participation, promoting social inclusion.

Additional mitigation measures highlighted in LV10 highlighted that draft Order Limits could include adequate room for planting and potentially mounding for additional screening.

ECC provided the following details in their relevant representation dated 27 November 2025:

- The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.
- As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination	
<b>EIA – Assessment Conclusions</b>				
3.6.10	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 10.7 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated position (February 2026):</b></p> <p>In relation to points raised in ECC's relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Consultation Report (<b>5.1 Consultation Report (Final Issue A) [APP-066]</b>) sets out the approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom English may be a second language. The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation</li> </ul>	<p>It is noted that mental health and wellbeing may also be impacted by residents experiencing anxiety in relation to air quality effects. However, with the mitigation measures identified, the residual effects of the Project in relation to Health and Wellbeing for both the general population and for vulnerable groups is considered to be neutral and not significant. This will need to be informed by the refreshed approach to health and wellbeing assessment in the revised technical note.</p> <p>It is also noted that mental health and wellbeing may be impacted in relation to effects on visual amenity during construction. However, effects are considered to be temporary, and the location of impacted population would change throughout the construction period due to the linear nature of the Project. Relevant mitigation includes community liaison measures to inform residents of construction activities. As noted in the revised health and wellbeing technical note, the effects would need to assess sensitivity of receptors across the linear project, magnitude of effect in relation to mental health and wellbeing. This should also</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>(SoCC), giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means.</p> <p>Appendix E - Community Engagement and Public Information of the <b>Outline Code of Construction Practice [APP-305]</b> sets out the communications channels and approach to community engagement during the construction of the Project, including the approach to engaging with local communities.</p> <ul style="list-style-type: none"> <li>We recognise that people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area.</li> </ul> <p><b>Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b> includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in <b>Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. Paragraph 17.5.47 identifies that, in a number of instances, adverse effects on mental health and wellbeing may be</p>	<p>include qualitative assessment of the anticipated mental health and wellbeing impacts as noted within the revised approach and should provide the opportunity to input qualitative information to co-produce mitigation measures to offset the anticipated mental health impacts from the project which is one of the listed protective factors within the assessment “facilitating participation”.</p> <p>It is noted preliminary residual effects of the Project in relation to Health and Wellbeing is potentially negative during construction due to changes in travel choice and potential effects on journey times and distances in particular for those accessing healthcare facilities. Though considered to be not significant, further assessment and mitigation measures should be provided in the ES according to the revised health and wellbeing assessment approach.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>EN-1 emphasises the need to assess potential impacts on vulnerable groups within society. The ES baseline data acknowledges that sections of the population along the project corridor do not speak English as their main first language, yet this vulnerability has not been considered within the sensitivity assessment or mitigation planning.</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.</p> <ul style="list-style-type: none"> <li>We understand that uncertainty while the Project is developed may cause anxiety. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including use of a dedicated phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</li> </ul>	<p>Communities with limited English proficiency may face barriers to understanding consultation materials, receiving construction updates, or engaging with health information - leading to heightened anxiety and exclusion from mitigation measures. ECC recommends that the Applicant adopt inclusive engagement methods, including translated materials, interpreters, and collaboration with local community and faith organisations. These measures would align with EN-1's requirement to take opportunities to promote local improvements to encourage health and wellbeing, especially for groups who may be differentially affected by the development.</p> <ul style="list-style-type: none"> <li>EN-1 (paragraph 4.4.5) requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Many Essex communities, particularly in Tendring, will experience overlapping NSIPs and growth schemes. The ES does not sufficiently consider the compounded psychological stress of multiple construction projects and landscape change. 32 6.8.10.</li> </ul> <p>ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed</p> <p>As ECC only had sight of NGET's Updated position (February2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.</p>	
3.6.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 10.7 of Chapter 10 (Health and Wellbeing)</b> of the <b>ES [APP-192]</b>.</p> <p><b>Updated position (February 2026):</b> Chapter 10 sets out the assessment of impacts as they relate to both physical and mental health and wellbeing, noting that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would bring. <b>Chapter 10 (Health and Wellbeing) [APP-192]</b> identifies that, whilst there are likely to be individuals who experience</p>	<p>Health and Wellbeing Chapter: Significant negative effects on landscape character during operation (and maintenance) are predicted to extend across the draft Order Limits and the surrounding landscapes within approximately 0.5 km to 1 km of the project. Similarly, significant negative effects on views and visual amenity during operation (and maintenance) are predicted to be experienced within approximately 1 km to 2 km of the project and these are likely to be experienced by a range of visual receptors including residents, road users and recreational receptors. It is understood that</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. This draws on findings presented in <b>Chapter 13 (Landscape and Visual) [APP-226]</b> and specifically the conclusions within <b>Appendix 13.4: Residential Visual Amenity Assessment (RVAA) [APP-233 and APP-234]</b> which finds no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live. It is noted within the RVAA that some properties / property groups do come close to this threshold and that mitigation measures have been recommended to reduce effects.</p> <p>The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</p> <p>With regards to visual effects, the LVIA presented in <b>6.13 Environmental Statement Chapter 13 - Landscape and</b></p>	<p>response of the local communities to these aspects are subjective, and effects are likely to be experienced by a proportion of the local population due to how the Project may impact setting of homes, businesses and or culturally or ecologically important community assets. Further assessment undertaken and presented in the ES should also draw from the mental health and wellbeing assessment approach within the refreshed approach to health and wellbeing assessment technical note which will include a qualitative aspect.</p> <p>As part of the Statutory Consultation, ECC Public Health highlighted the need to consider how significant negative impacts could be off set through positive community benefits for local communities within Essex, such as funding for community energy schemes, training, and skills investment within the local area for those adversely affected by the Project particularly in areas with high levels of deprivation.</p> <p>There is the opportunity to push for the creation of accessible green spaces providing benefits for health and wellbeing and enhancing biodiversity and local nature recovery.</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• The project will have clear and extensive</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Visual [APP-226]</b> identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most landscape and visual receptors within the study area are static, and so will experience effects across the more localised areas explained in the LVIA. For example, a recreational receptor within a certain park or street will only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the project as a whole. The total visual effects of the project as a whole will be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case landscape character areas or types). Again, they will not typically be experienced as a whole, but the total effect on landscape character can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.</p> <p>National Grid will continue to engage with</p>	<p>residual impacts that will adversely affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Furthermore, ECC contends that while the Norwich to Tilbury project will deliver 50 significant benefits at a national level, this will not offset the harm at the local level. This is not acceptable to ECC. ECC is therefore of the opinion, that the Norwich to Tilbury project should deliver significant beneficial socio-economic effects to the host communities, to offset impacts. It however, is concerned this issue and especially the associated social value opportunities around skills, training, and future employment, have not been fully assessed by the Applicant and needs to be as a matter of priority</p> <ul style="list-style-type: none"> <li>• The ES acknowledges that the proposals will have a significant negative landscape impact at both construction and operational stages over the length of the project. Where negative effects are judged not to be significant further away from the project line, the visual character of the landscape and its perceptual nature, is likely to combine to significantly negatively affect the landscape over a wide area, reducing scenic beauty and tranquillity, aesthetic</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		ECC on this matter.	<p>enjoyment, a sense of place, history and identity, and inspiration for learning throughout the landscape and visual study area</p> <ul style="list-style-type: none"> <li>• With regards to visual effects, the ES acknowledges that the proposals will have a significant negative visual impact over the length of the project. This is identified as up to 1.5Km from the project line in most situations. Generally, beyond 1.5Km it is accepted that individual impacts will not be significant. However, as a result of open landscapes, multiple 33 pylons in view and cumulative effects when passing from one visual receptor area to another, ECC considers that the cumulative impact is likely to result in an overall significant adverse effect generally within the study area during both the construction and operation stages.</li> <li>• As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.6.12	Outline CoCP	<p>The Outline CoCP includes all relevant mitigation measures specified in <b>Chapter 10 (Health and Wellbeing)</b>, of the <b>ES [APP-192]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the <b>Outline CoCP [APP-300]</b>.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the <b>Outline CoCP [APP-300]</b>.</p> <p>A further iteration of the <b>Outline CoCP [APP-300]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p> <p><b>Updated position (February 2026):</b></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>Health and Wellbeing Chapter:</p> <p>Note comments above for embedded, standard and additional mitigation measures which are applicable to the CoCP.</p> <p>Table 5.1 in the CoCP to include a section for construction and operation phase management phase in relation to health and wellbeing taking account of the refreshed approach to health and wellbeing assessment approach. This is currently referred to in section 5.1.11 of the outline CoCP has not been provided its own section in table 5.1.</p> <p>Refer to our <a href="#">Relevant Representation dated 27 November 2025 (RR-1083)</a>.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	Under Discussion

Other matters as required

### 3.7 Historic Environment

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.7.1	Policy and legislation (Archaeology)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 11.2 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b>.</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. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC (Archaeology) is currently reviewing the relevant documentation. The ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance. Further information will be included in the LIR.</p>	Under discussion
3.7.2	Policy and legislation (Built Heritage)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 11.2 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>National Grid notes the LPA's request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with the Scoping Report <b>[APP-288 – APP-296]</b>,</p>	<p>ECC (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report <b>[APP-209]</b> we are able to agree this matter.</p>	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>Scoping Opinion [APP-297] and the methodology set out in Environmental Statement Chapter 11- Historic Environment [APP-208]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The Applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.</p>		
<b>EIA – Approach and Methods</b>				
3.7.3	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
3.7.4	Data sources (Built Heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented	ECC (Built Heritage) confirm that this matter is agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>within <b>Section 11.4 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b>.</p> <p><b>Updated position (February 2026):</b></p> <p>Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. Environmental Statement Appendix 11.1 - Historic Environment Baseline Report <b>[APP-209]</b> 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>		
3.7.5	Data sources (archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within <b>Section 11.4 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> .	ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026).	Agreed
3.7.6	Data sources (archaeology) – survey data	Sufficient survey data has been collected to inform the assessment as presented within <b>Section 11.4 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> .	ECC notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. This matter remains under discussion.	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		National Grid will continue to engage with ECC on this matter.		
3.7.7	Assessment methodology (Built Heritage)	The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. National Grid position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation) above.	Email 4 <sup>th</sup> Nov 2024 - Built heritage – consultant's methodology not agreed, and all assets affected not identified. ECC (Built Heritage) is in agreement with this matter.	Agreed
3.7.8	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
3.7.9	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in <b>Section 11.4 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . The key parameters and assumptions presented are considered appropriate. February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic. March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.	ECC (Built Heritage) is in agreement with the matter following review of the ES.	Agreed
3.7.10	Key parameters and assumptions (Archaeology)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in <b>Section 11.4 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . The	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</i>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>key parameters and assumptions presented are considered appropriate.</p> <p>February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic.</p> <p>March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information and will continue to engage with ECC on this matter.</p>	<p><i>date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains."</i></p>	
<b>EIA – Baseline Conditions</b>				
3.7.11	Baseline conditions and receptors (Built Heritage)	<p>The baseline conditions and receptors for Historic Environment are presented in <b>Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]</b>. The baseline conditions and receptors presented are considered appropriate</p> <p>February 2025, National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</p> <p>Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).</p>	ECC (Built Heritage) is in agreement with this matter.	Agreed
3.7.12	Baseline conditions and receptors (Archaeology)	<p>The baseline conditions and receptors for Historic Environment are presented in <b>Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b></p> <p>February 2025, National Grid issued a draft Historic Baseline Report including Annex C and</p>	ECC agreed this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Annex D for agreement/comment and held a meeting on the topic.		
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.7.13	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in <b>Section 11.6 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>April 2025, National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.</p> <p><b>Updated position (February 2026):</b></p> <p>Matter remains under discussion for archaeology. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC (Archaeology) 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.</p> <p>Further time is needed to review <b>5.15 Design Development Report [APP-122]</b> but we note this refers only to changes requested to the route alignment which were made before the final ES.</p>	Under discussion
3.7.14	Standard mitigation (Built Heritage)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in <b>Section 11.6 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b></p> <p>Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences,</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</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [AS-046]. Specifically, this means:</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 <b>Chapter 14 - Noise and Vibration [APP-256]</b> did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial</p>	<p>buildings as works are undertaken to allay fears and allow the monitoring of effects.</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		(1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate. National Grid will continue to engage with ECC on this matter.		
3.7.15	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in <b>Section 11.6 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> and set out in the Outline CoCP <b>[APP-300]</b> . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	ECC (Archaeology) agreed this matter during call held January 2026.	Agreed
3.7.16	Additional mitigation	The consideration of additional mitigation measures are presented in <b>Section 11.6 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. <b>Updated position (February 2026):</b> 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
<b>EIA – Assessment Conclusions</b>				
3.7.17	Construction effects (Built Heritage)	The assessment of effects during construction is presented in <b>Section 11.7 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . The assessment of effects during construction presented is considered appropriate.	ECC (Built Heritage) are in agreement with this matter.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.7.18	Construction effects (archaeology)	The assessment of effects during construction is presented in <b>Section 11.7 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . The assessment of effects during construction presented is considered appropriate.	This section is currently under review (ECC Archaeology) Email 4 <sup>th</sup> 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 <sup>th</sup> Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, ECC (Archaeology) confirmed agreement on this matter during call in January 2026.	Agreed
3.7.19	Operational (and maintenance) effects (Built Heritage)	The assessment of effects during operation (and maintenance) is presented in <b>Section 11.7 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	This matter is agreed for Tendring, Braintree, Brentwood, Basildon and Colchester.	Agreed
3.7.20	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in <b>Section 11.7 of Chapter 11 (Historic Environment)</b> of the <b>ES [APP-208]</b> . 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
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.7.21	Outline CoCP	The Outline CoCP [APP-300] includes all relevant construction mitigation measures specified in <b>Chapter 11 (Historic Environment)</b> of the <b>ES</b>	Concern that the CoCP does not acknowledge the potential impacts to built heritage during the construction phase and makes reference only to the how the project may affect the historic environment	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>[APP-208] and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the Outline CoCP [APP-300].</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated position (February 2026):</b></p> <p>See 3.6.14 and 3.6.15 for current position.</p> <p>Discussion will be progressed following review of the LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>through disturbing known and unknown archaeology and the removal of historic landscape feature.</p> <p>This section is currently under review (ECC Archaeology). Further comments will be included within the LIR which require action.</p> <p>For ECC (Built Heritage) See 3.6.14 Standard mitigation (Built Heritage) for current position.</p>	
3.7.22	Environmental Actions and Commitments	Mitigation measures/ environmental commitments will be highlighted in the Outline CoCP.	<p>ECC (Archaeology) considers further actions are required within the OCEMP to ensure potential effects are considered. This will be expanded upon in the forthcoming Local Impact report.</p> <p>ECC position pending sight of the REAC.</p>	Under discussion
<b>Other matters as required</b>				
3.7.23	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical	<p><b>Updated position (February 2026):</b></p> <p>National Grid 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</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.	Agreed

	surveys and archaeological trial trenching.	appropriate and proportionate to the level of evaluation required.		
3.7.24	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	<p><b>Updated position (February 2026):</b> 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>	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.25	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) [APP-328] is considered appropriate and proportionate to the level of evaluation required.</p> <p>National Grid issued the Outline AMS-OWSI for the post-consent stage of the project in April 2025.</p> <p><b>Updated position (February 2026):</b> Discussion will be progressed following review of the LIR. National Grid will continue to engage with ECC on this matter.</p>	The Outline AMS-WSI is currently not agreed, further comments will be provided in the Local Impact report (ECC Archaeology).	Under discussion
3.7.26	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</p>	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

		<p>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>		
3.6.27	Supplementary Environmental Information	<p>NG sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued in June 2025.</p> <p>Given the comments provided it is understood that ECC are in agreement with the part of the note that sets out the approach to supplementary information that will be provided for the DCO examination.</p>	ECC is in agreement with this matter.	Agreed

### 3.8 Hydrology, Land Drainage and Flood Risk

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.8.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 9.2 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including storage calculations) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is also expected to be shared at Deadline 1.</p> <p>In paragraph 2.3.2 of <b>7.9 Flood Risk Assessment [APP-331]</b> the Applicant confirms that, the allowance applied</p>	<p>On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083).</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>For surface runoff disposal during construction and from built areas (offices, storage compounds), this will need to be designed in accordance with 'The Sustainable Drainage Systems Design Guide for Essex 2020' and should capture / control all surface water discharge. Unrestricted runoff from the site into any open water body or sewer is not considered acceptable.</li> <li>The LLFA notes that the allowance for climate change as proposed in the FRA, is 40% for drainage serving permanent assets. With reference to standard policy and guidance however, the normal expectation for climate change allowances</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>within the surface water drainage designs, is for a 45% uplift in peak rainfall for climate change. This is in line with ECC requirements.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>for peak rainfall is 45%. This latter figure should form the basis for assessment in the FRA.</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
<b>EIA – Approach and Methods</b>				
3.8.2	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
3.8.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>.</p> <p><b>Updated position (February 2026):</b></p> <p>Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is also expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation,</p>	<p>On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083)</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. National Grid will continue to engage with ECC on this matter.</p>	<p>laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
3.8.4	Assessment methodology	<p>The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. National Grid shared technical notes for the following:</p> <ul style="list-style-type: none"> <li>Works In, Over and Under Watercourses</li> </ul>	<p>The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>It was also noted in the Statutory Consultation that ECC does not raise any principal areas of disagreement with National Grid on this topic.</p>	Agreed
3.8.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in <b>Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. The key parameters and</p>	<p>On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>assumptions presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding</li> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
<b>EIA – Baseline Conditions</b>				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in <b>Section 12.5</b> of	On going discussions which have resolved many issues - further information to be provided within the FRA for submission with	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding</li> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.8.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in <b>Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b></p> <p>Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and</p>	<p>On going discussions which have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083). ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding</li> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>standards of the relevant LLFA and maintained for the Project's lifetime.</p> <p>National Grid will continue to engage with ECC on this matter.</p>		
3.8.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in <b>Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>The detail for the construction phase is acceptable – ECC Relevant Representation dated 27 November 2025 (RR-1083)</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</p>	Under discussion
3.8.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>Clarity required whether this point is referring to construction or operation of the scheme.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>National Grid will continue to engage with ECC on this matter.</p>		
<b>EIA – Assessment Conclusions</b>				
3.8.10	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>The detail provided is acceptable for construction phase but ECC would refer to comments raised in its Relevant Representation dated 27 November 2025 (RR-1083). ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
3.8.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>unacceptable surface water run-off and flooding</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.8.12	Outline CoCP (including Flood Warning and Evacuation Plan)	<p>The Outline CoCP <b>[APP-300]</b> includes all relevant construction mitigation measures specified in <b>Chapter 12 (Hydrology, Land Drainage and Flood Risk)</b> of the <b>ES [APP-221]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the Outline CoCP <b>[APP-300]</b>.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP <b>[APP-300]</b>.</p> <p>A further iteration of the Outline CoCP <b>[APP-300]</b> was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p><del>ECC position pending sight of final ES / FRA.</del></p> <p>The detail provided is acceptable for the construction phase but ECC would refer to comments raised in its Relevant Representation dated 27 November 2025 (RR-1083)</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	
<b>Other matters as required</b>				
3.8.13	Flood Risk Assessment (FRA)	<p>The draft FRA was issued to stakeholders in January and March 2025.</p> <p>The scope, methodology, assessment and conclusions drawn in the FRA are considered appropriate and proportionate.</p> <p><b>Updated position (February 2026):</b> Building on the information provided in Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.</p> <p>With regard to the culvert at the proposed Tilbury North Substation,</p>	<p>On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.</p> <p>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083)</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>commitment W08 within <b>7.2 Outline Code of Construction Practice [APP-300]</b>, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. National Grid will continue to engage with ECC on this matter.</p>	<p>not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding.</p> <ul style="list-style-type: none"> <li>• In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.</li> <li>• ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.</li> </ul>	

### 3.9 Landscape and Visual

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.9.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and Section 13.2 <b>Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><b>Update position (February 2026):</b></p> <p>National Grid note that following a meeting to discuss the Statement of Common Ground in January 2026 specific elements to discuss include National Landscapes and furthering the purpose and landscape mitigation/compensation.</p>	<p>ECC agree with the overarching policy documents stated in the PEIR but would wish to also see reference and further action in relation to NPS EN-1. Section 4 Assessment, Para 4.1.5 Weighing Impacts and Benefits: <i>'In considering any proposed development ... the Secretary of State should take into account...</i></p> <ul style="list-style-type: none"> <li><i>its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'</i></li> </ul> <p>In ECC's Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues they flagged that a Valued Landscape Assessment should form part of the Landscape and Visual Impact Assessment carried out e.g. through the final EIA. Local landscape designation no longer forms part of promoted government policy and therefore local value generally needs to be assessed in line with 'TGN 02-21: Assessing landscape value outside national designations'</p> <p>Valued landscape criteria have now been</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>included in the landscape assessment; however, ECC is concerned that some of the evaluation is flawed. In addition, as the baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly affected, particularly river valleys ECC also had concerns regarding whether a preliminary judgement on significance had been determined without going through the stage of identifying susceptibility and magnitude of effects. ECC are substantially satisfied that all stages of the LVIA process have been executed although not necessarily with all aspects of the approach.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	
<b>EIA – Approach and Methods</b>				
3.9.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>Generally ECC do not have issues with the study area, however, in relation to the visual assessment ECC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 13.4 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> .	<p>ECC Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified that the limited number of viewpoints and visualisations that are proposed over the length of the Project needed to be reviewed. Generally, ECC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, ECC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance ECC also remarked that the preliminary LVIA did not appear to include details of the agreed criteria on which the assessment judgements are based Whilst all criteria have now been identified and presented in the ES, ECC retain issue with the approach to landscape value and value of the view.</p> <p>ECC identified a number of additional areas where they believe data quality and presentation could be improved in order to aid access and interpretation. The following remain of concern</p> <ul style="list-style-type: none"> <li>• Increase scale of visual receptor maps e.g., a 1:10,000 baseline as used for the Proposed Project Design Maps</li> <li>• Wireline visualisations e.g., <i>Volume II: Figures Part 18 of 27: Figures 13.9.51 - 13.9.56 - Wireline Visualisations</i>. Label by route section and/or district rather than figure number alone.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.9.4	Assessment methodology (including LVIA methodology and viewpoints)	<p>The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>Meetings were held on the 25 September 2024 to seek to agree the detailed methodology as well as the number and location of viewpoints. ECC requested the inclusion of a Valued Landscape Assessment.</p> <p>An appraisal of landscape value was undertaken and is provided in Annex A of <b>Appendix 13.2: Landscape Baseline and Assessment [APP-228]</b>. This is not a full Valued Landscape Assessment but adopts the criteria within Landscape Institute guidance, 2021, which National Grid consider to be appropriate for the Project.</p> <p>March 2025, National Grid issued an update on the Landscape and Visual Impact Assessment (LVIA) Viewpoints and Methodology.</p>	<p>ECC welcome the changes made on the other issues.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p> <p>In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, ECC retain concerns in a select individual areas where there remain gaps in the coverage. Still under discussion. In relation to valued landscapes see comments from statutory consultation and response at 3.8.3 above.</p> <p>ECC retain concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 <i>'Outside nationally designated areas, there are local landscapes that may be highly valued locally'</i> nor how the following in the current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: <i>'Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.'</i></p> <p>This issue relates particularly in several river valleys along the route.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in <b>Section 13.4 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> . The key parameters and assumptions presented are considered appropriate.	Latest version of ES required – ECC position to be confirmed. ECC are not sure what is meant by the terms key parameters and assumptions. Section 13.4 is headed 'Project Engagement and Consultation'. To be reviewed.  Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under discussion
<b>EIA – Baseline Conditions</b>				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in <b>Section 13.5 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> . The baseline conditions and receptors presented are considered appropriate.	Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified concerns with the Visual Receptors and Groupings have been identified based only partially on shared landscape characteristics and a similarity in the nature of views. ECC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. ECC retain these concerns.  Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in <b>Section 13.6 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> . Embedded mitigation	E-mail 5 <sup>th</sup> Nov 2024 – Landscape – adequacy of undergrounding, mitigation and lack of compensation are all still under discussion. ECC retain these concerns.  ECC acknowledges the embedded and standard mitigation measures proposed.	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	However, significant residual impacts remain, particularly in sensitive landscape areas. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in <b>Section 13.6 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> and set out in the Outline CoCP <b>[APP-300]</b> . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Standard mitigation does not address residual significant landscape and visual impacts. Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under discussion
3.9.9	Additional mitigation	The consideration of additional mitigation measures are presented in <b>Section 13.6 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Additional mitigation does not address residual significant landscape and visual impacts. Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.9.10	Construction effects	The assessment of effects during construction is presented in <b>Section 13.7 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> . The assessment of effects during construction presented is considered appropriate.	E-mail 4th Nov 2024 - Landscape – Potential tree and hedgerow loss along the route has not been meaningfully quantified in landscape and visual terms in the assessment.	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Updated position (February 2026):</b> With regard to vegetation loss, the assessment is based on the vegetation clearance assumptions set out in <b>Chapter 4: Project Description [APP-130]</b> and presented on the Trees and Hedgerows to be Removed and or Managed Plans <b>[APP-048 to APP-055]</b>.</p>	<p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 13.7 of Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p><b>Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues –</b></p> <p>ECC identified that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing is required, particularly in river valleys, to protect valued local landscapes, long-distant rights of way and rural amenity sites.</p> <p>ECC also flagged up that the PEIR acknowledges there will be a significant negative landscape and visual impact at both construction and operational stages over the length of the Project.</p> <p>And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this.</p> <p>The issues above remain substantially unaddressed.</p> <p>Criteria for e.g. the sensitivity (susceptibility and value) and magnitude of effects, are now presented in the ES although ECC retain</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>concerns with how some of these are defined and evaluated.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.9.12	Outline CoCP	<p>The Outline CoCP <b>[APP-300]</b> includes all relevant construction related mitigation measures specified in <b>Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP- 226]</b> 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 <b>[APP-300]</b>.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP <b>[APP-300]</b>.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	Under discussion
3.9.13	Outline LEMP	<p>The Outline LEMP includes all relevant operational related mitigation measures specified in <b>Chapter 13 (Landscape and Visual)</b> of the <b>ES [APP-226]</b> and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the <b>Outline LEMP [AS-046]</b>.</p>	<p>Retain major issues particularly in relation to definition, scope and scale of term 'compensation'.</p> <p>In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from "enhanced mitigation" to "landscape compensation" require clarification to ensure</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP [AS-046].</p> <p>A further iteration of the Outline LEMP [AS-046] was issued in May 2025 following the meeting and feedback in writing.</p>	<p>these are not repurposed mitigation measures, risking double-counting.</p> <p>ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence.</p> <p>ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	
3.9.14	Cumulative Effects	<p>National Grid notes the comments and will continue to engage with ECC on this matter.</p>	<p>Concern regarding potential cumulative adverse landscape and visual effects, both at construction and long-term operational, particularly in relation to other NSIP projects such as Bramford to Twinstead, North Falls and Five Estuaries substations.</p> <p>In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>impacts, alongside financial compensation packages.</p> <p>The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact across the entire county, especially in the vicinity of Ardleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states: "Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."</p> <p>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Other matters as required				

### 3.10 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.10.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context)</b> and <b>Section 15.2 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p> <p><b>Updated position (February 2026):</b></p> <p>Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This level of employment is modest in scale and is not considered significant</p>	<p>Latest iteration of Technical Note to be reviewed.</p> <p>It is also requested that skills should be considered separately from community benefits.</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• ECC also considers that the Applicant should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes: <ul style="list-style-type: none"> <li>– Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes</li> <li>– Commitments to local job creation and use of local contractors where feasible</li> <li>– Evidence-based interventions informed by community engagement and local labour market data</li> </ul> </li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>when compared with employment demand in other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material 1 in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance<sup>[OBJ]</sup>.</p>	<ul style="list-style-type: none"> <li>– A sustainability and legacy framework to ensure initiatives continue from construction through to operation</li> <li>– As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
<b>EIA – Approach and Methods</b>				
3.10.2	Study area	<p>The Scoping Opinion stated, <i>“The Applicant should seek to agree the study area with the relevant local authorities”</i>. A meeting was held on 12</p>	<p>Email dated 3rd October 2024 confirmed that ECC were in agreement on the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the</p>	Agreed

<sup>1</sup> Department for Energy Security and Net Zero (2025) Community Funds for Transmission Infrastructure.

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>September 2024 to seek to agree this point in the Scoping Opinion.</p> <p>Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity.</p>	<p>Technical Note, in relation to employment and skills.</p> <p>Email dated 10 April 2025 noted:</p> <p>In principle ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, would propose that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.</p> <p>As ECC only had sight of updated position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.10.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]</b>.</p> <p>Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. The Applicant is committed to working constructively with Local Authorities and local partners to</p>	<p>Clarification requested on what is being done for training and skills. There is a lack of reference to data on employment and skills and it is suggested a regional skills analysis is undertaken.</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>To enable effective planning and ensure Essex residents are equipped to take advantage of employment opportunities arising from this project, ECC strongly urges the Applicant to provide detailed labour market demand data as early as possible. This will allow for timely</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</p>	<p>coordination with local education and training providers, enabling the development of targeted upskilling programmes and reducing the risk of workforce shortages that could delay project delivery.</p> <ul style="list-style-type: none"> <li>As ECC only had sight of NGET's updated position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
3.10.4	Assessment methodology	<p>The Scoping Opinion stated, <i>“The Applicant should seek to agree the study area with the relevant local authorities”</i> and <i>“The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities”</i>. A meeting was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion.</p> <p>Further discussions will take place following National Grid's review of ECC's Local Impact Report (LIR).</p>	<p>Email dated 10th April 2025 noted: In principle ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, would propose that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.</p> <p>During their review of the Statement of Common Ground on 16 December 2026, ECC request further discussion on status of this position.</p>	Under discussion
3.10.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in <b>Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES</b></p>	<p>ECC position pending sight of ES and any further technical paper on this subject.</p> <p>However, ECC would like to make a general comment requesting clarification on what NG are doing for training and skills. There is a lack of reference to data on employment and</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>[APP-265]. The key parameters and assumptions presented are considered appropriate.</p> <p>ECC comments are noted, and National Grid will continue to engage with ECC on this matter.</p> <p>The scale of construction employment arising from the Project is modest, as set out in ID 3.9.3. Regional employment and skills analysis are set out in the <b>ES, Chapter 15: Socio-economics, Recreation and Tourism, Paragraph 15.5.8 to 15.5.15 [APP-265]</b>. Notwithstanding this, the Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</p> <p>Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>skills, and it is suggested that a regional skills analysis is undertaken. ECC would also like to take the opportunity again to suggest that skills should be considered separately from community benefits.</p> <p>. It is expected that further detail will be provided in the Local Impact Report.</p> <p>As ECC only had sight of NGET's updated position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.10.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in <b>Section 15.5 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC position pending sight of ES and any further technical paper on this subject. It is expected that further detail will be provided in the Local Impact Report.</p>	Under discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.10.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in <b>Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC position pending sight of ES and any further technical paper on this subject. It is requested that skills should be considered separately from community benefits. . It is expected that further detail will be provided in the Local Impact Report.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.10.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in <b>Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b> and set out in the Outline CoCP <b>[APP-300]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>ECC position pending sight of ES and any further technical paper on this subject.</p> <p>It is requested that skills should be considered separately from community benefits.</p> <p>ECC provided the following details in their relevant representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• The Applicant should actively engage with relevant partners to mitigate risks associated with skills shortages and consider opportunities for shared apprenticeships, traineeships, and collaborative training programmes across concurrent projects. A strategic approach 29 that considers the wider infrastructure pipeline will help maximise social value and ensure long-term benefits for the local workforce.</li> <li>• ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</li> </ul>	Under discussion
3.10.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>Updated position (February 2026):</b></p>	<p>ECC position pending sight of ES and any further technical paper on this subject.</p> <p>It is requested that skills should be considered separately from community benefits.</p> <p>ECC have not provided further comments following review of the Statement of Common Ground it is expected that further detail will be provided in the Local Impact Report.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.		
<b>EIA – Assessment Conclusions</b>				
3.10.10	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC position pending sight of ES and any further technical paper on this subject. It is expected that further detail will be provided in the local impact report.</p>	Under discussion
3.10.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><b>Updated position (February 2026):</b> Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC position pending sight of ES and any further technical paper on this subject. ECC have not provided further comments following review of the Statement of Common Ground. It is expected that further detail will be provided in the local impact report.</p>	Under discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.10.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in <b>Chapter 15 (Socio-economics, Recreation and Tourism)</b> of the <b>ES [APP-265]</b>. 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 <b>[APP-300]</b>.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP <b>[APP-300]</b>.</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated position (February 2026):</b></p> <p>Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>	<p>ECC position pending sight of ES and any further technical paper on this subject.</p> <p>It is expected that further detail will be provided in the Local Impact Report.</p>	Under discussion
<b>Other matters as required</b>				
3.10.13	Skills and Training	<p>Regional employment and skills analysis are set out in the ES, Chapter 15: Socio-economics, Recreation and Tourism, Paragraph 15.5.8 to 15.5.15 <b>[APP-265]</b>.</p> <p><b>Updated position (February 2026):</b></p>	<p>ECC would like to make a general comment requesting clarification on what National Grid are doing for training and skills. There is a lack of reference to data on employment and skills, and it is suggested that a regional skills analysis is undertaken. ECC would also like to take the opportunity to suggest that skills</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>The Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary, or proportionate in the context of this Project.</p> <p>As set out above in ref 3.9.3, the construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. As such, there is no planning harm that would justify the imposition of a financial contribution or fund as mitigation through the Development Consent Order.</p> <p>It is also important to note that the creation of an Employment and Skills Fund would constitute a community benefit measure, rather than mitigation for a specific environmental impact. In accordance with established principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through statutory planning requirements. This position is reinforced by the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025), which makes clear that contributions of this nature should be</p>	<p>should be considered separately from community benefits.</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• Securing employment and skills benefits must be a central focus of this development and appropriate consideration should be given to this matter within the Examination. There is a real opportunity not only to mitigate potential negative impacts but to leave a lasting legacy by upskilling Essex residents and addressing existing sectoral skills gaps. ECC expects the Applicant to work with local partners to ensure that jobs created by the project are accessible to local people and that appropriate training pathways are in place.</li> <li>• To support this, ECC strongly recommends the establishment of a dedicated Employment and Skills Fund. This fund should be proportionate to the scale and impact of the development and used to <ul style="list-style-type: none"> <li>– Invest in local further education facilities and provision</li> <li>– Support employment and skills programmes</li> <li>– Enhance careers education and school engagement</li> </ul> </li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>progressed outside the development consent process.</p>	<ul style="list-style-type: none"> <li>– Fund ECC officer resource for consultation and monitoring of the employment and skills strategy.</li> <li>– As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	
3.10.14	Cumulative Effects	<p>Inter-project cumulative effects are set out in Chapter 17 (Cumulative Effects) of the ES [APP-281].</p> <p><b>Updated position (February 2026):</b>The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. The Applicant is committed to supporting skills development and</p>	<p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy.</li> <li>• As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes:</p> <ul style="list-style-type: none"> <li>• Working with local suppliers and supporting forums, such as Chambers of Commerce</li> <li>• Contributing to a coordinated regional approach to electricity industry jobs and skills planning</li> <li>• Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.</li> </ul> <p>These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement.</p> <p>In this regard, it is noted that community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through the DCO, consistent with the principles set out in the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025). National Grid will continue to engage with ECC on this matter.</p>		

## 3.11 Traffic and Transport

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.11.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 16.2 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		Agreed
<b>EIA – Approach and Methods</b>				
3.11.2	Study Area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed	Agreed
3.11.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 16.4 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> .	Waiting for information on latest traffic data comparison with model survey data + queue data for validating model. Received verbal confirmation that existing survey data used in the modelling was based on worst case hour for each junction.	Under Discussion
3.11.4	Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Previous concerns around using 2019 DfT data rather than more recent data have been dealt where 2023 DfT data is presented.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.5	Key parameters and assumptions	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in <b>Section 16.4 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> . The key parameters and assumptions presented are considered appropriate.	<p>Comments on committed development provided by ECC on 27 August 2025 need to be taken into account.</p> <p>Not all traffic assumptions have been accepted as they relate to agreement on monitoring, management and mitigation to ensure the assumptions are retained – in particular:</p> <ul style="list-style-type: none"> <li>• Workers arrive/depart outside of the local highway peak hours including during the autumn/winter months when there is potential for reducing working days due to weather and lighting conditions</li> <li>• Car occupancy rates of the workforce and mode share</li> <li>• Road crossings have not been assessed in the ES on the basis that there is no increase in baseline traffic along the local road. However, there will be impacts as a result of an increase in baseline traffic crossing the local road in terms of safety. ECC would expect this to be managed/agreed through the design process of the crossover and a commitment included in the CTMP – for example our request to include throttling of vehicle movements.</li> </ul> <p>Some parameters have not been accepted as follows:</p> <ul style="list-style-type: none"> <li>• HGV arrivals/departures during the peak hours on some routes where</li> </ul>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>there is sensitivity (specific highway junctions/links (tbc) and routes with nearby schools (tbc))</p> <ul style="list-style-type: none"> <li>• Collision clusters have been determined based on a high threshold level – ECC have reviewed collision data along the PARs and wants to discuss further</li> <li>• The thresholds for parking impacts are not accepted. A case by case basis is considered more reasonable.</li> <li>• Identity of sensitive receptors in the vicinity of the PARs relating to school activity</li> <li>• Table 16.5 sets out assessment criteria based on thresholds that are defined in the IEMA Guidelines. However, the guidance is clear that these should be viewed as a starting point and used cautiously in any assessment, and that full regard should be given to specific local conditions with a level of judgement required to determine effects.</li> <li>• The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet.</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Baseline Conditions</b>				
3.11.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Traffic and Transport are presented in <b>Section 16.5 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>Applicant to review comments provided on 27<sup>th</sup> August 2025 on committed development</p> <p>Consideration of school activity, personal injury clusters, PRow and pedestrian routes on narrow footways on PARs.</p> <p>Pinch points/traffic calming.</p>	Under Discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.11.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in <b>Section 16.6 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>. This includes the <b>Outline CTMP</b> (document reference 7.3) which includes all relevant construction related mitigation measures and traffic routing. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>The details provided at Section 16.6 of the ES are agreed. However, the details in the Outline CTMP referenced need further discussion:</p> <p>ECC to review proposed diversion routes on public highways when further information has been provided as follows: Existing baseline traffic on diversion route, existing baseline traffic on the route that is to be temporarily closed, and proposed construction traffic (volume and traffic makeup).</p> <p>Further discussion on monitoring commitments and requirements in CTMP.</p> <p>Extraordinary maintenance on local highway network including carriageway and structures (over and above the road condition defects commitment)</p> <p>Further detail needed on shift patterns and how defined hours for construction workers</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>assumed in the ES are managed and enforced.</p> <p>Commitment to reducing freight by road including measures and reference to Multi Modal Strategy considerations.</p> <p>Commitment to monitor and review the number of vehicles in the ES, and interventions where there is an increase in vehicles.</p> <p>Wider commitment to engaging with the public.</p>	
3.11.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in <b>Section 16.6 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> and set out in the <b>Outline CoCP</b> (document reference 7.2) [APP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	As above for embedded mitigation.	Under Discussion
3.11.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in <b>Section 16.6 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Including mitigation for all PRoW that link onto or cross the PARs</p> <p>Mitigation for narrow footways on PARs</p> <p>Mitigation for road safety issues on PARs</p> <p>Junction mitigation</p> <p>Crossing facilities/pinch points</p> <p>Construction traffic restrictions where school activity exists on PARs.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Assessment Conclusions</b>				
3.11.10	Construction effects	The assessment of effects during construction is presented in <b>Section 16.7 (Residual Effects) of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> . The assessment of effects during construction presented is considered appropriate.	<p>There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route.</p> <p>Impacts on pedestrians on narrow footways in rural locations along the PARs.</p> <p>Impacts on pedestrian's crossing along key desire lines along the PARs</p> <p>Effects at existing traffic calming features on Spa Roa, Witham in relation to accommodating HGV movements.</p> <p>Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations.</p> <p>PAR 50 – Table A16.4.5 in Document 6.16.A4 states mitigation has been implemented to reduce magnitude of impact but nothing has been defined. Discuss potential mitigation (possible controlled crossing at Robjohns Road/Westway/Retail Access).</p> <p>Details of effects on bus passenger delay below 4 weeks including school buses.</p>	Under Discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.11.11	Outline CoCP	The <b>Outline CoCP [APP-300]</b> includes all relevant construction related mitigation measures specified in <b>Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b> and	Discussion related to 3.10.7 - 3.10.10	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9<sup>th</sup> October to agree on the structure for the <b>Outline CoCP [APP-300]</b>.</p>		
<b>Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance</b>				
3.11.12	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in <b>Chapter 3</b> of the <b>TA (document reference 7.11) [APP-333]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	Agreed	Agreed
<b>Transport Assessment – Approach and Methods</b>				
3.11.13	Study Area	<p>The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRow and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within <b>Section 2.21 (Transport Assessment Study Area)</b> of the <b>TA (document reference 7.11) [APP-333]</b>. The Study Area is considered appropriate for the assessment.</p>	The study area is agreed.	Agreed
3.11.14	Multi-modal Strategy	<p>A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the</p>	The multi modal assessment is considered appropriate.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>wider highway network as presented within <b>Appendix G (Multi-Modal Transport Report)</b> of the TA [APP-340].</p> <p>The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).</p>		
3.11.15	Junction Capacity Assessment Methodology	<p>Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented in <b>Section 6.9 (Construction Traffic Assessment Methodology)</b> of the TA (document reference 7.11) [APP-333]. This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate.</p>	Agreed	Agreed
3.11.16	Junction Modelling	<p>The methodology used for undertaking junction assessments is presented in <b>Section 6.9 (Construction Traffic Assessment Methodology)</b> of the TA (document reference 7.11) [APP-333]. The assessment methodology used is considered appropriate.</p>	Accept use of JUNCTIONS 10 and LINSIG industry standard software for the junction modelling.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.17	Assessment of WCH	<p>The assessment of WCH impacts as a result of the Project is presented in <b>Section 7.4 (Walkers, Cyclists and Horse riders network)</b> of the TA (document reference 7.11) [APP-333]. This is based on the assessment undertaken within <b>Section 16.7 (Residual Effects)</b> [APP-281] and <b>Appendix 16.4: Traffic and Transport Construction Effects of Chapter 16 - Traffic and Transport (document reference 6.16.A4)</b> [APP-279]. The assessment methodology used is considered appropriate.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>Note the TA reference is 7.16 (not 7.4)</p> <p>There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route. Note details of PAR 39, 41 and 51.</p> <p>Impacts on pedestrians on narrow footways in rural locations along the PARs. Examples include PARs 37, 41-43. Further review of rural lanes with narrow footways on PARs</p> <p>Impacts on pedestrian's crossing along key desire lines along the PARs.</p> <p>Effects at existing traffic calming features on Spa Roa, Witham in relation to accommodating HGV movements (PAR 43).</p> <p>Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations.</p>	Under Discussion
3.11.18	Impact on Parking	<p>The methodology for the assessment of impact to on-street parking is presented within <b>Section 6.5 (on Street Parking)</b> of the TA (document reference 7.11) [APP-333]. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.</p>	<p>Discrepancies between text in TA and TRO Schedule for on street parking restrictions to be discussed.</p> <p>Details of how the parking provision for construction worker vehicles will be defined, monitored, managed to ensure there is sufficient parking provision.</p> <p>The threshold in the ES for parking/loading analysis is not accepted.</p> <p>Impact on HGV driver facilities.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		National Grid will continue to engage with ECC on this matter.		
3.11.19	Road Safety	<p>An assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in <b>Section 4 (Baseline Conditions)</b> of the <b>TA (document reference 7.11) [APP-333]</b>. Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics.</p> <p>Areas where potential road safety issues have been identified, as set out within <b>Section 7 (Transport Assessment)</b> of the <b>TA (document reference 7.11) [APP-333]</b>, will be highlighted within the Driver's pack as part of mitigation measures secured within the <b>Outline CTMP (document reference 7.3) [APP-309]</b>. The assessment methodology used is considered appropriate.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	Under discussion – ECC have a number of locations on the PARs that the applicant needs to consider.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>Transport Assessment – Mitigation Measures</b>				
3.11.20	Mitigation Measures	<p>Mitigation measures include embedded, standard and additional mitigation identified within <b>Section 2.2 (Project Description)</b> of the <b>TA (document reference 7.11) [APP-333]</b> and as reported within <b>Section 16.6 of Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>. This includes the <b>Outline CoCP (document reference 7.2) [APP-300]</b>, <b>Outline CTMP (document reference 7.3) [APP-309]</b> and additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>Junction mitigation to be agreed. Same comments as per ES as both documents are related.</p>	Under Discussion
<b>Transport Assessment – Baseline Conditions</b>				
3.11.21	Baseline conditions	<p>The baseline conditions and sensitive receptors for Traffic and Transport are presented in <b>Section 4 (Existing Baseline Transport Conditions)</b> of the <b>TA (document reference 7.11) [APP-333]</b> and are considered appropriate.</p>	<p>Personal Injury Collision Data.</p> <p>More traffic surveys have been undertaken by the applicant to compare to the baseline and use for model calibration.</p> <p>Receptors are not included in the TA document.</p> <p>Existing HGV driver facilities.</p>	Under Discussion
<b>Transport Assessment – Future Baseline Conditions</b>				
3.11.22	Growth Factors	The future baseline traffic on the SRN /	Agreed	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in <b>Chapter 5 (Future Baseline)</b> of the <b>TA (document reference 7.11) [APP-333]</b>. Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.</p>		
3.11.23	Cumulative Developments	<p>The committed developments included within the cumulative assessment for the future baseline year are presented in <b>Chapter 5 (Future Baseline)</b> of the <b>TA (document reference 7.11) [APP-333]</b>. These have been derived through a review of local authority planning portals and information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.</p>	<p>ECC provided list of committed development through informal consultation to be considered.</p>	Under Discussion
<b>Transport Assessment – Trip Generation</b>				
3.11.24	Key Assumptions	<p>Key assumptions associated with the Traffic and Transport assessment are summarised in <b>Section 16.4 of Chapter 16 (Traffic and Transport)</b> of the <b>Environmental Statement (ES) [APP-271]</b> and <b>Section 6.7 of Chapter 6 of the Transport Assessment (document reference 7.11) [APP-333]</b>. The key</p>	<p>Note comments for 3.10.5 as both TA and ES use same assumptions.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		assumptions presented are considered appropriate.		
3.11.25	Methodology	The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within <b>Section 6 (Methodology)</b> of the <b>TA (document reference 7.11) [APP-333]</b> is considered suitable and robust.	The methodology is agreed in that it based on other sites. However, is subject to monitor, manage and mitigate (which has not yet been agreed.	Under Discussion
3.11.26	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in <b>Section 6.3 (Construction Vehicles Overview)</b> of the <b>TA (document reference 7.11) [APP-333]</b> . The trip generation is considered appropriate.	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet.	Under Discussion
3.11.27	Construction Workforce Trips	Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in <b>Section 6.4 (Construction Staff Overview)</b> of the <b>TA (document reference 7.11) [APP-333]</b> . An <b>Outline Construction Workers Travel Plan (CWTP)</b> has been prepared as part of the DCO application and is contained as an appendix within the <b>Outline CTMP</b>	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>(document reference 7.3) [APP-309].  The <b>Outline CWTP</b> will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate.  National Grid will continue to engage with ECC on this matter.</p>		
<b>Transport Assessment – Conclusions</b>				
3.11.28	Overall impact of the Project	<p>The conclusions of the Transport Assessment are presented within <b>Section 8 (Conclusion)</b> of the <b>TA (document reference 7.11) [APP-333]</b>. The conclusions are considered appropriate.  National Grid will continue to engage with ECC on this matter.</p>	The mitigation/management and monitoring is not agreed.	Under Discussion
<b>Outline Construction Traffic Management Plan (CTMP)</b>				
3.11.29	Project Team Roles and Responsibilities	<p>The Project Teams Roles and Responsibilities are set out in <b>Section 3</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>. These are considered to be clear and sufficient for the delivery of the Project.</p>	Agreed	Agreed
3.11.30	Pre-and Post Construction Surveys	<p>Details of the proposed Pre and Post Construction surveys are set out in <b>Section 5.2</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b> and connect to the mitigation measures detailed within the <b>Outline Code of Construction Practice (oCOCP) (document reference 7.2) [APP-300]</b>.</p>	Further discussions/commitments needed on extraordinary flows and maintenance liability for local highway network (including road and structures).	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>These pre- and post-construction surveys are considered appropriate for the Project. National Grid will continue to engage with ECC on this matter.</p>		
3.11.31	Traffic Management Measures	<p>Details of the proposed traffic management measures are set out in <b>Section 5.8</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>. These traffic management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>Further discussion needed around semi-permanent nature of the traffic management measures.</p> <p>Commitment to discuss disruption to bus services (particularly school buses) with bus operator/LHA where routes are diverted with a view to minimising impacts—regardless of duration.</p>	Under Discussion
3.11.32	Implementation/ Enforcement	<p>The implementation and enforcement process set out in <b>Section 6</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b> is considered to be appropriate and adequate for the Project.</p> <p>National Grid will continue to engage with ECC on this matter</p>	<p>Detail and discussion required regarding:</p> <ul style="list-style-type: none"> <li>Monitoring</li> <li>Wider community engagement and ALLs</li> <li>Developers Forum and collaborative working to minimise cumulative impacts</li> </ul>	Under Discussion
<b>Outline Construction Workers Travel Plan (CWTP)</b>				
3.11.33	Policy	<p>The policy context, including legislation and guidance considered in the development of the document is set out in <b>Section 4</b> of the <b>Outline CWTP (Appendix B of the Outline CTMP) (document reference 7.3) [APP-311]</b>. All relevant legislation, policy, and guidance have been identified and appropriately considered to inform the <b>Outline CWTP</b>.</p>	<p>The Essex Travel Plan Guidance includes requirement for baseline figure</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.34	Site Accessibility Review	The Site Accessibility review is captured within <b>Section 5</b> of the <b>Outline CWTP (Appendix B of the Outline CTMP) (document reference 7.3) [APP-311]</b> . This review is appropriate for the Project.	Agreed	Agreed
3.11.35	Targets, Strategy, and Measures	Targets are set out within <b>Section 6</b> of the <b>Outline CWTP (Appendix B of the Outline CTMP) (document reference 7.3) [APP-311]</b> . Strategy and Measures are set out within <b>Section 8</b> of the <b>Outline CWTP [APP-311]</b> . The construction targets set out are considered to be relevant and achievable, given the present stage of Project development. The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project.	Detail and discussion required regarding: Commitment to minibuses. More detail on how measures will be implemented. Parking management. ECC require some interventions in place if the assumptions do not come to fruition on mode share and associated parking numbers, number of workers and worker arrivals/departure times. Action Plan	Under Discussion
3.11.36	Monitoring and Review	The proposed monitoring and review process is set out in <b>Section 9</b> of the <b>Outline CWTP (Appendix B of the CTMP) (document reference 7.3) [APP-311]</b> . This is considered to be suitable and appropriate, given the present stage of Project development.	Detail and discussion required regarding: Monitoring frequency. Details of monitoring parking. Frequency of review.	Under Discussion
<b>Construction Access Strategy and Design</b>				
3.11.37	Construction Access Approach	The approach for construction access for the Project is proposed to utilise designated routes for construction traffic	Construction access utilising designated routes is an agreed approach.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>on local roads. These are defined as 'Primary Access Routes' (PARs) within <b>Section 5</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>. This approach is considered to be suitable for construction traffic for the Project.</p>		
3.11.38	Primary Access Route Selection	<p>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the <b>Indicative Highway Mitigation Plans</b> within <b>Appendix C</b> of the <b>CTMP (document reference 7.3) [APP-312 to APP-320 inclusive]</b>. These have been discussed with Essex County Council during regular engagement meetings since September 2023. These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the <b>Outline CTMP [APP-309]</b>.</p>	Awaiting highway mitigation and access designs following RSA and DR, and response from ECC.	Under Discussion
3.11.39	Construction Access and Crossover Design	<p>The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in <b>Schedule 9 – Access to Works</b> of the <b>Draft Development Consent Order [APP-056]</b> and further shown in the <b>Indicative Highway Mitigation Plans</b> within <b>Appendix C</b> of the <b>Outline CTMP [APP-312 to APP-320 inclusive]</b>. These locations are considered to be suitable for use by the proposed construction traffic as part of the Project.</p>	Awaiting crossover designs following RSA with Designer's Response, and response from ECC.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>The designs of the proposed accesses in these locations have been based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road Safety Audits (RSAs) have been undertaken for each proposed location, overseen by Essex County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Essex County Council as the Overseeing Authority.</p>		
3.11.40	Highway Mitigation Design	<p>Mitigation measures proposed on the Public Highway are described in <b>Section 5</b> of the <b>Outline CTMP [APP-309]</b>, and are further set out in the following DCO Schedules <b>[APP-056]</b>:</p> <ul style="list-style-type: none"> <li>• <b>Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout.</b></li> <li>• <b>Schedule 6, Part 2 - Street Subject to Temporary Alteration of Layout.</b></li> </ul> <p>These are considered to be suitable and sufficient for the delivery of the Project. Where measures have been identified which may require works outside of the Public Highway (categorised as 'Red' mitigations in <b>Section 5.9</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>, specific designs have been developed for these locations. These designs were discussed with Essex County Council during an engagement session in April 2025, and further to this Stage 1</p>	Awaiting mitigation plans following RSA, Designer's Response, and ECC response	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>Road Safety Audits have been undertaken for each location, overseen by Essex County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Essex County Council as the Overseeing Authority.</p>		
3.11.41	Traffic Management	<p>Traffic Management measures proposed on the Public Highway are described in <b>Section 5</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b> and further set out in <b>Schedule 5 - Streets Subject to Streetworks</b> of the <b>Draft Development Consent Order [APP-056]</b>. These are considered to be suitable and sufficient for the delivery of the Project. Approaches to Traffic Management were discussed in principle during engagement session in June 2024, and further specific measures relating to highway mitigation design were discussed during an engagement session in April 2025. National Grid will continue to engage with Essex County Council as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (<b>ID 3.10.40</b>), and highway mitigation design (<b>ID 3.10.41</b>).</p>	<p>Awaiting mitigation plans following RSA, Designer's Response and ECC response. Commitment that all signage to be placed in highway land is agreed with the highway authority.</p> <p>Para 5.9.5: The land should be reinstated "where agreed" as there may be situations where the changes to infrastructure can remain rather than be reinstated to its previous condition.</p> <p>Mitigation measures under discussion. Designs under discussion.</p>	Under Discussion
3.11.42	Traffic Regulation Orders and Temporary	Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation	Further information is awaited before ECC can provide comment on the TROs.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
	Traffic Regulation Orders	<p>Orders (TTROs) are shown in the <b>Traffic Regulation Order Plan (document reference 2.4) [APP-025 to APP-032 inclusive]</b> and set out in <b>Schedule 13</b> of the <b>draft DCO (document reference 3.1) [APP-056]</b>:</p> <ul style="list-style-type: none"> <li>• <b>Part 1 - Temporary Restriction of Waiting and Restriction of Speed.</b></li> <li>• <b>Part 2 - Permanent Restriction of Waiting and Restriction of Speed.</b></li> <li>• <b>Part 3 - Temporary Restriction of Access.</b></li> <li>• <b>Part 4 - Temporary no Overtaking Order.</b></li> </ul> <p>These are considered to be suitable and sufficient for the delivery of the Project. National Grid will continue to engage with Essex County Council as the proposed TROs and TTROs are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (<b>ID 3.10.40</b>), and highway mitigation design (<b>ID 3.10.41</b>).</p>		
3.11.43	Highway Mitigation Design on National Highways Infrastructure	Further to Matter <b>ID 3.10.41</b> (Highway Mitigation Design), it has been identified that the A120(E) / Bentley Road junction (described in <b>Section 5.9</b> of the <b>Outline CTMP [APP-309]</b> ) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this proposed mitigation impacts	Would expect input into the design but accept that National Highways would be the Overseeing Organisation.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.</p>		
3.11.44	Construction Access Design on National Highways Infrastructure	<p>Further to Matter <b>ID 3.10.39</b> (Construction Access and Crossover Design), it has been identified that bellmouth TB-B059 off the A120 Colchester Road east of Coggeshall (described in <b>Section 5.9</b> of the <b>Outline CTMP [APP-309]</b>) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this access is proposed to be taken directly from the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.</p>	Agreed	Agreed
3.11.45	Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road	<p>National Grid have engaged with Essex County Council around the proposed Primary Access Route (PAR) on Bentley Road and Ardleigh Road, south and west of Little Bromley in Tendring. This route is shown as H17-A2 on the <b>Indicative Highway Mitigation Plans</b> within <b>Appendix C</b> of the <b>Outline CTMP (document reference 7.3) [APP-312 to APP-320 inclusive]</b>.</p> <p>A mitigation scheme has been developed to facilitate the use of this route by the Project. This is detailed in <b>Section 5.8</b> of</p>	<p>Details still outstanding – for example, ground conditions (existing construction of Bentley Road), and remote cycle way provision (maintenance issues), Awaiting response following RSA, Designer's Response and ECC comments.</p> <p><b>Updated position February 2026:</b> ECC require a commitment in the CTMP that a comprehensive investigation of the construction of Bentley Road will be undertaken by the Contractor to inform the subsequent detailed design for the works on Bentley Road. Our concern is whether</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>the <b>CTMP [APP-309]</b>, and includes four principal components:</p> <p>Improvement of the A120(E) / Bentley Road junction, as discussed in Matter ID 3.10.43.</p> <p>Widening of the existing carriageway along Bentley Road and Ardleigh Road, to be retained in the permanent case to accommodate National Grid's operational access requirements to the proposed Substation.</p> <p>A permanent private access road between Bentley Road and Ardleigh Road, to be retained in the permanent case to accommodate National Grid's operational access requirements to the proposed Substation. This would not be adopted as part of the Public Highway.</p> <p>A temporary facility for Non-Motorised Users separate to the carriageway along Bentley Road and Ardleigh Road. The provision of this facility has been discussed with Essex County Council, and it has been agreed that it would be required in the temporary case only, and would be removed following the completion of construction activities.</p> <p>Appropriate coordination of these arrangements with Essex County Council, National Highways, and other developers in accordance with <b>Section 6.6</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>. This proposed arrangement is</p>	<p>there is sufficient depth of construction in the existing carriageway for the widening works to tie into, and that it can accommodate the volume of construction traffic.</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		considered suitable and sufficient for the proposed construction and operational access usage.		
<b>Abnormal Indivisible Load (AIL) Access</b>				
3.11.46	Abnormal Indivisible Load (AIL) Access Approach	<p>The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within <b>Section 5</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b> and further detailed within the <b>AIL Access Strategy (Appendix A of the Outline CTMP (document reference 7.3) [APP-310]</b>. A draft version of the AIL Access Strategy was shared with Essex County Council in March 2025.</p> <p>This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p> <p>National Grid held a Traffic and Transport Working Group Meeting following the closure of the targeted consultations. Updates were provided relating to engagement on AILS, PRowS and highways modelling.</p>	Principle of using designated routes on the local road network is agreed. However, details to be agreed.	Agreed
3.11.47	Abnormal Indivisible Load (AIL) Access Routes	<p>Routes proposed to be utilised by AILs are shown in the <b>AIL Access Strategy (Appendix A of the Outline CTMP (document reference 7.3) [APP-310]</b>.</p> <p>These have been developed following consultations with Essex County Council.</p>	<p>Ongoing discussions with respect to ongoing structural investigations. ECC provided initial comments during informal consultation period on dwg file provided in terms of tracking: H14-AIL1 wheel tracking appears to overrun edge of</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>As part of these consultations, draft route information was shared in July 2024 and April 2025.</p> <p>National Grid will continue to engage with Essex County Council on the proposed AIL access routes, including with respect to the ongoing structural investigations.</p>	<p>carriageway A120 RAB; H17 – AIL 1 wheel tracking overruns island on Pattricks Junction A120; confirmation on missing x ref (x-OS TL8122)</p> <p>Drawings showing AIL tracking as pdf version have been requested for ECC colleagues to review.</p>	
3.11.48	Abnormal Indivisible Load (AIL) Structural Investigations	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in the <b>AIL Access Strategy (Appendix A of the Outline CTMP) (document reference 7.3) [APP-310]</b>. National Grid have been consulting with Essex County Council in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by Essex County Council in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the <b>AIL Access Strategy (Appendix A of the Outline CTMP) (document reference 7.3) [APP-310]</b>.</p> <p>Engagement with respect to impacted structures is anticipated to be ongoing in parallel with the Development Consent Order process. It is understood that any Approvals in Principle secured at the</p>	Ongoing discussions over feasibility with respect to structural investigations.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>current stage of project development do not remove requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out within <b>Section 6</b> of the <b>AIL Access Strategy (Appendix A of the Outline CTMP)</b> (document reference 7.3) [APP-310].</p> <p>This approach is considered to establish in principle that the proposed AIL deliveries required for the Project are feasible, and that a suitable process is being undertaken in order to facilitate the anticipated formal AIL movement applications anticipated during construction of the Project.</p> <p>The AIL applications submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangements to accommodate the movements with minimal impact on the network.</p>		
3.11.49	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the <b>Indicative Highway Mitigation Plans</b> within <b>Appendix C</b> of the <b>Outline CTMP</b> (document reference 7.3) [APP-312 to APP-320 inclusive]. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project</p>	<p>Ongoing discussions.</p> <p>Awaiting final drawings following RSA, Designer's Response and ECC comments.</p> <p>Confirmation that all AIL mitigations are included in the RSAs undertaken.</p> <p>Proposals not included in the RSAs are to be confirmed to ensure they are exempt.</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>(ID 3.10.41), and are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Management measures relevant to AIL movements are discussed within <b>Section 5.9</b> of the <b>Outline CTMP (document reference 7.3) [APP-309]</b>, and <b>Section 6</b> of the <b>AIL Access Strategy (Appendix A of the Outline CTMP) (document reference 7.3) [APP-310]</b>. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p> <p>In April 2025, National Grid held a further meeting to discuss the AIL process and report with ECC, Essex and Suffolk police.</p>	<p>It is noted that works at A131 Beaulieu Parkway at roundabout with Loverose Way require an RSA.</p> <p>Detail and discussion required regarding: Wider community engagement. VMS and website.</p>	

### 3.12 Public Rights of Way (PRoW)

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>PRoW Assessment Chapter</b>				
3.12.1	PRoW Separate Chapter	<p>As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the <b>Environmental Statement (ES)</b>.</p> <p>Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a</p>	No comment	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative <b>ES</b> chapter.</p> <p>Note that an <b>Outline Public Rights of Way Management Plan [APP-329]</b> (item <b>ID 3.11.3</b>) has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project.</p>		
3.12.2	Types of PRoW	<p>Types of PRoW intended to be considered as part of the Management Strategy were shared with Essex County Council within Section 2.1 of the PRoW Methodology Statement document in April 2025. This list is considered to suitable, and no additional PRoW types are required to be captured. The PRoW types intended to be considered are:</p> <ul style="list-style-type: none"> <li>• Formally designated PRoWs (footways, bridleways, restricted byways, and byways open to all traffic)</li> <li>• Permissive paths</li> <li>• Open access land</li> <li>• Cycle tracks, including the National Cycle Network</li> <li>• Other routes with public access.</li> </ul> <p>This is set out in <b>Section 1.4</b> of the <b>Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329]</b>.</p>	<p>There should be a separation between routes with legal status and administered by ECC, and those that have not got legal status – i.e. Permissive Paths and Other Routes with public access. ECC have no influence over or interest in the routes with no legal status and are unable to make comment on them. The PROW MP does create the separation and so this table should reflect that as well.</p> <p>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Updated Position (February 2026):</b>  The Applicant reviewed the presence of routes with and without legal status whilst preparing the <b>Outline PRow Management Plan [APP-329]</b> and impacts are identified separately for each type of Right of Way, thus distinguishing between their legal status. The review concluded that there were no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway.</p>		
3.12.3	Proposed Management Regime Approach	<p>The intended approach to management regimes to be considered as part of the Management Strategy were shared with Essex County Council within Section 2.4 of the PRow Methodology Statement document in April 2025. This established the following hierarchy of management measures:</p> <ul style="list-style-type: none"> <li>• PRowS to be kept upon existing alignments as a first preference, utilising management measures if required.</li> <li>• Where maintaining existing PRow alignments is not practicable, diversions along the shortest suitable route will be proposed.</li> <li>• Where no suitable diversion routes are identified, PRow closures will be considered as a last resort.</li> </ul>	<p>No Very few permanent stopping up of PRow has been identified at this stage. If, at detailed design, it becomes apparent that further permanent stopping up is required, ECC and National Grid will continue to engage to understand how best to mitigate the effects, consistent with the principles of the PRow Management Plan. Additionally, and with reference to discussions on the PRow Management Plan, where bridleways need to be diverted or fenced adjacent to a haul road due to construction works it is noted there have been discussion around providing 4m wide routes because the horses need space to turn due to spooking associated with the construction works. As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a</p>	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>This is set out in <b>Section 3</b> of the <b>Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329]</b>.</p> <p>National Grid will continue to work with ECC, including if any permanent stopping up becomes apparent.</p> <p><b>Updated Position (February 2026):</b></p> <p>The Applicant confirms that, should detailed design identify the need for any additional PRow to be permanently stopped-up, the Applicant will continue to engage with Essex County Council to consider appropriate mitigation in line with the principles set out in the <b>Outline PRow Management Plan [APP-329]</b> and the process for change detailed in its Section 7.</p> <p>With regard to bridleways, the Applicant acknowledges discussions relating to appropriate widths where diversions are required. Following engagement with Local Highway Authority PRow Officers, the <b>Outline PRow Management Plan [APP-329]</b> notes that bridleways which are constrained on both sides should be a minimum of 4 metres wide between fencing or other such constraint, to allow sufficient width for horses to turn around.</p>	<p>comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.12.4	Routes with Public Access Affected by the Proposed Development	<p>Routes with public access affected by the proposed development are shown in the <b>Access, Rights of Way and Public Rights of Navigation Plans</b>. Details of proposed management measures for each impacted route are shown in <b>Section 4 of the Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329]</b>. These are considered to be suitable, in line with the Proposed Management Regime Approach (<b>ID 3.11.3</b>) set out above.</p>	They have published the plans now and ECC can see that the management measures are suitably identified on each PROW.	Agreed
3.12.5	Reinstatement Approach	<p>All PROWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with Essex County Council PROW Officers as well as impacted landowner(s).</p> <p>This is set out in <b>Section 3 of the Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329]</b>.</p>	No comment.	Agreed

### 3.13 Cumulative Effects

Table 3.13 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.13.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 17.2 of Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><b>Updated Position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>Awaiting confirmation pending sight of further information. ECC would refer to its Relevant Representation submitted 27 November 2025 (RR-1083)</p> <p>ECC provided the following details in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>It is noted that the Applicant has confirmed they will liaise with other developments (notably North Falls, Five Estuaries and Lower Thames Crossing) likely to be taking place at the same time as Norwich to Tilbury to reduce cumulative impacts. Though, ECC would require the commitment to go further in joining and positively engaging with a Developer's Forum to be set up by ECC with key members of the other NSIP Teams as well as other Strategic Site Teams, alongside Local Highway Authority and Planning Authority participation. In addition, further information on the detailed build programme will be required for the various stages of the construction through the Construction Management Plan which will be fed into from the</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>Developer's Forum. It is anticipated that all three approaches will assist in reducing the cumulative impact but there will still remain a legacy impact.</p> <ul style="list-style-type: none"> <li>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</li> </ul>	
<b>EIA – Approach and Methods</b>				
3.13.2	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
3.13.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Sections 17.4 and 17.5 of Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b>.</p> <p><b>Updated Position February 2026:</b></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>No comments raised in the ECC relevant representations in relation to data around Cumulative Effects. It is noted further ongoing discussion is required on this matter.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	Under discussion
3.13.4	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
3.13.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects	Further information is required on a number of proposed aspects as set out in ECC's	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
<p>assessment are summarised in <b>Sections 17.5 and 17.6 of Chapter 17 (Cumulative Effects) of the ES [APP-281]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated Position February 2026:</b></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><b>EIA – Baseline Conditions</b></p>				
3.13.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters (<b>Chapters 6 – 16 of the ES</b>). The baseline conditions and receptors presented are considered appropriate.</p>	<p>This is the subject of on-going discussions.</p>	Under discussion
<p><b>EIA – Embedded, Standard and Additional Mitigation Measures</b></p>				
3.13.7	Embedded mitigation	<p>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (<b>Chapters 6 – 16 of the ES</b>). Embedded mitigation measures, designed as an inherent part of the Project are therefore set out in the environmental topic chapters of the <b>ES</b>.</p>	<p>ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083). Further discussions are required on a range of issues to ensure mitigation is agreed and secured appropriately.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated Position February 2026:</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>authority has not had sight of the National Grid's deadline 1 response.</p>	
3.13.8	Standard mitigation	<p>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (<b>Chapters 6 – 16</b> of the <b>ES</b>). Standard mitigation measures during construction are summarised in the environmental topic chapters (<b>Chapters 6 – 16</b> of the <b>ES</b>) and set out in the Outline CoCP [<b>APP-300</b>]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated Position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the</p>	<p>ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083). Further discussions are required on a range of issues to ensure mitigation is agreed and secured appropriately.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.13.9	Additional mitigation	<p>relevant representations process (document reference 8.4.1)</p> <p>The consideration of additional mitigation measures are presented in <b>Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>ECC comments are noted, and NG will continue to engage with ECC on this matter.</p> <p><b>Updated Position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083). Further discussions are required on a range of issues to ensure mitigation is agreed and secured appropriately.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.13.10	Construction effects	<p>The assessment of effects during construction is presented in <b>Section 17.4 and 17.5 of Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><b>Updated Position (February 2026):</b> National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)</p>	<p>ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083). ECC has concerns regarding the effect of construction traffic on the County's highway network and cumulative noise and environmental impacts. .</p> <p>ECC provided the following details in their relevant representations dated 27 November 2026:</p> <ul style="list-style-type: none"> <li>ECC is also concerned with the cumulative noise and environmental</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>impacts arising from these developments. Taken together, especially in the Tendring area, but all along the route, the proposals have the potential to lead to significant adverse effects on communities and the environment. It is crucial that respite is offered to the communities affected by the development through reasonable working hours and construction traffic management. ECC is therefore seeking substantially better controls within the Development Consent Order and the Management Plans to ensure this respite is secured.</p> <ul style="list-style-type: none"> <li>• In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages.</li> </ul> <p>A particular concern is in relation to the effect of construction traffic on the County's highway network. Minimal information is available concerning the development programme and timing for this project and how this relates to various other projects. It will be important for there to be coordination</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>between ECC and all developers / key stakeholders for the effect on local communities to be minimised. This is addressed in more detail below within the 'Local Highway Impact' section. ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	
3.13.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in <b>Section 17.4</b> and <b>17.5</b> of <b>Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Further discussions will take place following additional information from ECC.</p>	<p>In the absence of information, it is difficult to confirm the acceptability of the effects during operation (and maintenance), but it is recognised on-going discussions seek to resolve these issues.</p> <p>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.</p>	Under discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.13.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in <b>Chapter 17 (Cumulative Effects)</b> of the <b>ES [APP-281]</b> and is appropriate for</p>	<p>ECC will be preparing detailed commentary in respect of the DCO and Management Plans in its Local Impact Report.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>managing construction impacts from the Project.</p> <p>A meeting was held in October to agree on the structure for the Outline CoCP [APP-300].</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><b>Updated Position (February 2026):</b></p> <p>Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.</p>		
<b>Other matters as required</b>				
3.13.13	Cumulative Impacts	<p><b>Updated Position (February 2026):</b></p> <p>The intra-cumulative assessment within <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> assessed the impacts on common receptors within the ES (Volume 6 of the DCO application) in accordance with the agreed methodology in the 6.19 Scoping Report [APP-288 - 296] and 6.20 Scoping Opinion [APP-297].</p> <p>Multiple developments that are proposed to connect to the Project within Essex, are assessed within <b>6.17</b></p>	<p>Relevant Representation received 27 November 2025:</p> <ul style="list-style-type: none"> <li>Cumulative impacts are clearly one of the key principle issues in the Examination. ECC is aware of a significant number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula and other NSIP schemes dependent on Norwich to Tilbury). Three NSIPs will already interact in concentrated ways in specific places in Essex, which could be exacerbated by a fourth NSIP. As set out</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p><b>Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b>, in accordance with the agreed methodology in the <b>6.19 Scoping Report [APP-288 – APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b>, including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors as a result of the Project.</p> <p>The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025; however, since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, the Tarchon</p>	<p>across this response, the Norwich to Tilbury project is a catalyst and has the potential to give rise to intra-project cumulative effects in addition to the effects arising from other strategic development projects. The cumulative effect of these will need to be considered, especially with regard to highways, landscape and visual, noise, for example. The fourth NSIP, Tarchon Interconnector for which an application for Development Consent is expected to be submitted to the Planning Inspectorate in September 2027.</p> <ul style="list-style-type: none"> <li>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</li> </ul>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Interconnector project will be required to undertake its own cumulative assessment with other developments as part of their respective development consent application.		

### 3.14 Development Consent Order

Table 3.14 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.14.1	DCO Requirements – timescales	<p><b>Position provided February 2026:</b></p> <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 Clean Power Target of 2030, is not unnecessarily delayed by circumstances outside the control of National Grid.</p> <p>There is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the <b>draft DCO [APP-056]</b> 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</p>	<p>The process and timeframes across the DCO must be sufficient for the relevant local authority to consider, undertake the necessary checks, engage with relevant stakeholders and respond to such applications submitted to it.</p> <p>As ECC only had sight of NGET's "position February 2026" on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question.</p> <p>In any case, National Grid will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure Essex County Council, and other relevant host authorities, are able to respond on programme.</p>		
3.14.2	DCO Requirements – disapplication of legislation	<p><b>Position provided February 2026:</b> ECC comments on the disapplication of The Hedgerow Regulations are noted. National Grid awaits ECC's comments in the LIR.</p>	<p>The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC is reviewing the Hedgerows Regulations Report (APP-161) and will expand within the ECC Local Impact Report.</p> <p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under discussion
3.14.3	DCO Requirements – protective provisions	<p><b>Position provided February 2026:</b> ECC comments on the protective provisions are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>As highway authority, ECC welcomes draft Protective Provisions but these need to be the subject of further discussion between ECC and the Applicant to ensure appropriate mitigations.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.14.4	DCO Requirements – draft Requirements	<p><b>Position provided February 2026:</b> ECC comments on the draft Requirements are noted, and National Grid will continue to engage with ECC on this matter.</p>	<p>The draft Requirements require further discussion both in terms of their scope, and current detail. This includes in relation to construction hours, piling and potential noisy works. ECC will be seeking to ensure communities have appropriate periods of respite from noisy and invasive construction activities.</p> <p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under discussion
3.14.5	DCO Requirements – certified documents and management plans	<p><b>Position provided February 2026:</b> The <b>7.2 Outline Code of Construction Practice [APP-300]</b> secures a number of measures that would robustly control the construction and operation of the Project in terms of works to watercourses, land drainage, surface water drainage and pollution risks. It is therefore not considered necessary that the <b>7.9 Flood Risk Assessment [APP-331]</b> becomes a certified document, however, National Grid will</p>	<p>The Lead Local Flood Authority ("LLFA") is concerned that the dDCO, Draft Schedule of Requirements and Explanatory Memorandum do not highlight the existing flood risk, the need for managing said risk and/or the presence of overland flows. This issue is relevant for both pre and post construction. ECC suggests that the Flood Risk Assessment and the Surface Water Management Principles document be listed as 'CERTIFIED DOCUMENTS' of the DCO and that the Construction Environmental Management Plan is drafted to control works</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>continue to engage with ECC on this matter.</p>	<p>that affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants.</p> <p>As ECC only had sight of NGET's position (2026) on 20 February 2026, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.14.6	DCO Requirements – register of Requirements	<p><b>Position provided February 2026:</b></p> <p>The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State. At present, there are no Requirements proposed to be discharged by the Secretary of State. Each authority should maintain a register of DCO Requirement discharge applications, as it would planning condition discharge applications and, therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>Given the scale and complexity of the project across multiple areas, ECC would encourage that the DCO requires the Applicant to maintain a 'Register of Requirements' such as that seen in the Lower Thames Crossing Development Consent Order to ensure ongoing fairness, public confidence and transparency. Additionally, to ensure the timeliness and efficiency of the discharge of requirements process this should include all relevant certified plans and documents that will be required to undertake the assessment of the submitted requirement material.</p> <p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under discussion
3.14.7	DCO Requirements – submissions for discharge of Requirements	<p><b>Position provided February 2026:</b></p> <p>Those Requirements that require the submission of substantive documents specify the required content of these documents. In particular, any</p>	<p>The content and quality of any submission for the discharge of requirements must be to an agreed standard to support efficient processing.</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>submissions under Requirement 4 must be in substantial accordance with the relevant outline management plan, which ensures that the relevant authorities are aware of the nature of the submission they will receive and which will support effective and efficient processing.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.14.8	DCO Wording – definitions and terminology	<p><b>Position provided February 2026:</b> ECC comments on the consistency of terminology in the <b>draft DCO</b> are noted, and NG will review and consider these points in the next revision of the draft DCO.</p>	<p>For consistency within the DCO, there are a number of definitions and drafting points to be addressed (such as the use of 'business day,' 'working day' and 'day' interchangeably; and 'discharging authority' and 'relevant authority'). The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it.</p> <p>As ECC only had sight of NGET's position (2026) on 20 February 2026, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	Under discussion
3.14.9	DCO wording – authorised development and LoD	<p><b>Position provided February 2026:</b> The authorised development and associated development are described in Schedule 1 to the <b>draft DCO</b> (APP-056). The authorised development is further shown on the Works Plans.</p>	<p>In respect of Article 3, clarity is needed that the development consent is provided for the authorised development "to be carried out within the Order limits" (as defined in the dDCO), so that the scope and limits of the development consent can be clearly set out,</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>In addition, the Applicant submitted a <b>Details of Associated Development with references to documents</b> report (APP-121) with its application, which delineates the authorised development and the associated development. The limits of deviation are set out in Article 5 (limits of deviation) to the draft DCO are shown on the <b>Works Plans</b> (APP-017 to APP-024) and in the table of parameters at the back of the Works Plans for each section.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>in order to reflect the development subject to the examination.</p> <p>Further clarity is needed around the limits of deviation and authorised development so that the scope of the development consent can be clearly set out, in order to reflect the development subject to the examination. As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	

Other matters as required

### 3.15 Other Matters

Table 3.15 Matters Agreed, Not Agreed or Under Discussion in relation to Other Matters

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.15.1	Dunton Hills Garden Village Viability	<p><b>Updated Position (February 2026):</b></p> <p>National Grid has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. National Grid consider it possible for the overhead line to co-exist with the housing proposals and have</p>	<p>ECC reserves its final position subject to the outcome of the Savills report into the impact of the proposal on the viability of the proposed development and the ability to support necessary affordable housing and infrastructure to support the creation of a sustainable community. ECC would reiterate its concern regarding the lack of any baseline</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		<p>sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design.</p> <p>National Grid also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. National Grid continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the National Grid's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites.</p> <p>National Grid will continue to engage with ECC on this matter.</p>	<p>assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely significant effects from those impacts to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.</p> <p>ECC refers to it's Relevant Representation submission (27 November 2025) paragraphs 6.2.16-6.2.21) (RR-1083). ECC commissioned Savills to investigate the impact of the pylons and overhead power lines on the planned viability and deliverability of the garden village development at Dunton Hills and specifically, the impacts of the N2T proposals on property prices and the Residential Gross Development Value (RGDV) of the proposed Dunton Hills Garden Village (DHGV) scheme.</p> <p>The report concludes that the introduction of overhead pylons is likely to have a material impact on residual land value with a reduction in the order of £17.5m to a policy compliant scheme.</p> <p>ECC will therefore be continuing to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the viability and deliverability of both, DHGV and</p>	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>emerging development proposals in Basildon Borough directly to the east</p> <p>Continued engagement and discussion would be welcomed.</p> <p>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination</p>	
3.15.2	Climate Change	ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation.	Under discussion
3.15.3	Green Infrastructure / BNG	ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	<p>ECC places significant importance on protecting and enhancing green infrastructure, accessibility, and biodiversity net gain. There is no objections in principle to the relocation, alignment of pylons in several of the sections, where it reduces the removal of trees and reduce the impact on mature woodlands but ECC supports a strategy that seeks to maximise opportunity to reduce environmental impacts and for habitat retention, enhancement, and creation through the delivery of Green Infrastructure to meet the biodiversity net gain requirements and align with the Essex Local Nature Recovery Strategy objectives. Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation</p>	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			<p>ECC recommends that landscape and BNG plans for Norwich to Tilbury NSIP be aligned with other regional projects (e.g. North Falls and Five Estuaries offshore wind farms) where the project crosses over such as ECAN, to support coherent habitat creation, reduce fragmentation, and strengthen GI and nature recovery delivery across the wider landscape.</p> <p>ECC requests detailed mapping showing how the project supports LNRS priorities and a robust monitoring framework to ensure delivery of GI benefits over time.</p>	
3.15.4	Removal of Obsolete Pylons	ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	ECC welcomes the proposal to remove a number of 132kV pylon lines operated by UK Power Networks and would encourage National Grid to continue to explore opportunities for N2T to facilitate the removal of further 132kV pylon lines operated by UK Power Networks, to reduce the cumulative visual impact of energy infrastructure, and compensate for the additional LSE to landscape and amenity of the proposed new 400kV power lines	Under discussion
3.15.5	Airfields	ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	ECC reserves its position on this issue pending the outcome of these discussions and confirmation regarding the impact on the future use of airfield across the country as highlighted in the response to the targeted consultation.	Under discussion

## 4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Essex County 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 Essex County Council:

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Date:

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# Abbreviations

<b>Abbreviation</b>	<b>Full Reference</b>
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
ECC	Essex County Council
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
MIIA	Mineral Infrastructure Impact Assessment
MRA	Minerals Resource Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PARs	Primary Access Routes
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation

<b>Abbreviation</b>	<b>Full Reference</b>
SPZ	Source Protection Zone
WFD	Water Framework Directive
WIIA	Waste Infrastructure Impact Assessment
WSI	Written Scheme of Investigation
Zol	Zone of Influence
ZTV	Zone of Theoretical Visibility

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