

AENC-NG-CNS-REP-0280

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.4.2 Policy Compliance Tracker  
- Clean Version**

**Final Issue B**

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**nationalgrid**

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# 1. Introduction

## 1.1 Overview

- 1.1.1 National Grid prepared and submitted **5.7 Policy Compliance Document [APP-086]** as part of its application for development consent. The Policy Compliance Document was prepared in compliance with Regulation 5(2)(q) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 which require ‘*any other documents considered necessary to support the application*’. The Policy Compliance Document provided an assessment of the Project’s strategic alignment and conformity with the following policy documents:
- **Overarching National Policy Statement for Energy (EN-1) (2024)** (Department for Energy Security and Net Zero)
  - **National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024)** (Department for Energy Security and Net Zero)
  - **National Policy Statement for Renewable Energy Infrastructure (EN-3) (2024)** (Department for Energy Security and Net Zero).
- 1.1.2 The Policy Compliance Document also set out how the Project is in general accordance with the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024), as well as relevant adopted and emerging local plan and neighbourhood plan policies which were in place on or before 1 April 2025.
- 1.1.3 Since submission of the application, a number of relevant national and local planning policy documents have been subject to consultation, or adopted.
- 1.1.4 In the Rule 6 Letter **[PD-009]**, the Examining Authority requested National Grid to provide:
- A National Policy Statement Tracker, which sets out the changes/modifications to any relevant updated National Policy Statement (NPS)
  - A tracker related to any other new government policy intentions for energy and critical energy infrastructure that are not addressed within the NPSs
  - Updates with regard to the draft NPPF (published December 2025).
- 1.1.5 In addition, the Examining Authority also requested a tracker on any National Development Management Policies (NDMP) and development plan documents published for consultation or adopted as National Grid considers them to be relevant to the Project.
- 1.1.6 The Examining Authority requested the production of a Policy Compliance Tracker for Deadline 1 **[REP1-133]**, Deadline 4 (this submission) and Deadline 7.
- 1.1.7 **8.4.2 Planning Policy Compliance Tracker [REP1-133]** was produced as an addendum to **5.7 Policy Compliance Document [APP-086]** for Deadline 1. The Policy Compliance Tracker provided an assessment of emerging and adopted policy issued since 1 April 2025 up to 13 February 2026 including those documents referenced above.

- 1.1.8 This iteration of the Policy Compliance Tracker for Deadline 4 incorporates an assessment of the Project against emerging and adopted policies issued between 13 February and 17 May 2026.
- 1.1.9 In addition, this policy compliance tracker incorporates responses from Local Planning Authorities and Parish Councils to the Examining Authority Written Question GEN 1.3:

## 1.2 National and local planning policy compliance tracker

*'Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process. The applicant submitted a policy compliance tracker [REP1-133] at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies. The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate representation of their newly designated and/ or emerging policies and provide any additional comments relating to the applicant's regard to those policies. All relevant planning authorities are invited to make comment on the content of the compliance tracker. If you have already dealt with changes to policy in your local impact report (LIR) there is no need to provide a response.'*

1.2.1 Responses to the above question were received from:

- Norfolk County Council [REP3-084]
- South Norfolk District Council [REP3-092]
- Suffolk County Council [REP3-085]
- Essex County Council [REP3-077] and [REP3-078]
- Colchester City Council [REP3-076]
- Tendring District Council [REP3-094]
- Braintree District Council [REP3-091]
- Chelmsford City Council [REP3-075]
- Basildon Borough Council [REP3-095]
- Thurrock Council [REP3-088].

1.2.2 Babergh and Mid Suffolk District Councils, Brentwood Borough Council, Swainsthorpe, Newton Flotman, Hintlesham and Chattisham and Copdock and Washbrook Parish Councils did not provide a response to Question GEN 1.3.

- 1.2.3 A number of the above responses to Question GEN 1.3 signposted back to a response provided in the Local Impact Reports submitted at Deadline 2. A number of Local Impact Reports included a list of planning policies which were considered to be of relevance to the Project. This iteration of the Policy Compliance Tracker includes those policies which were not included (or were abbreviated) in the assessment presented in:
- **5.7 Policy Compliance Document [APP-086]**
  - **8.4.2 Policy Compliance Tracker [REP1-133].**
- 1.2.4 The Applicant would note that since the publication of **8.4.2 Policy Compliance Tracker [REP1-133]** there have been no updates to report on, regarding the following documents:
- Consultation Draft National Planning Policy Framework
  - National Development Management Policies
  - Transitional Regional Energy Strategic Plan.
- 1.2.5 An updated Policy Compliance Tracker will capture any updates where they are made ahead of Deadline 7.

## 2. Signposting for how the Project has had regard to Local Planning Policy

### 2.1 Norfolk County Council

2.1.1 In their response to the **Examining Authority's Written Questions 1 [REP3-084]** Norfolk County Council confirmed that their **Local Impact Report [REP1-173]** already refers only to the 'new' Norfolk Minerals and Waste Local Plan (adopted 20 May 2025). Norfolk County Council concluded that it was satisfied that the Applicant has complied with the policies of Norfolk Minerals and Waste Local Plan.

### 2.2 South Norfolk District Council

2.2.1 In their response to the Examining Authority's Written Questions 1 **[REP3-092]** South Norfolk District Council made reference to the following documents:

- a) 'The Greater Norwich Growth Board updated the [Green Infrastructure] strategy on 11 March 2025 which includes a [Greater Norwich Green Infrastructure] web app.
- b) The Norfolk Local Nature Recovery Strategy was published on 31st October 2025 along with the Norfolk Local Habitat Map. Both documents should be used to inform strategic habitat enhancements and creation (relates to B201 in the oCOCP).'

2.2.2 The Applicant notes that the above documents are not part of the development plan for South Norfolk District Council.

#### Green Infrastructure Strategy

2.2.3 The Applicant notes that the Green Infrastructure Strategy has been updated. The Strategy is identified as a flexible framework for guiding and prioritising the most suitable types, locations and scale of Green Infrastructure needed to support future growth, alongside health and wellbeing, biodiversity and climate resilience. It is not identified to be part of the development plan for South Norfolk District Council. The Applicant notes relationship between the Strategy and Implementation of the Greater Norwich Green Infrastructure Strategy SPD (draft for consultation) November 2025.

2.2.4 The Applicant supports the delivery of Green Infrastructure and Environmental Net Gain (ENG) but does not consider a separate strategy is necessary or required by national policy for the purposes of granting a consent for this project. The Applicant's commitment to the delivery of 10% BNG forms part of ENG and includes the delivery of wider environmental and societal benefits which includes Green Infrastructure. For further details see **7.1 Biodiversity Net Gain Report [APP-299]**. Full details of the off-site solution and added environmental and societal value would be reported through the final iteration of the off-site BNG Report. The Applicant has in fact committed to deliver at least 10% BNG for the Project. On site (within the Order Limits) measures will be secured through **7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-030]** and Requirement 4 of **3.1 Draft**

**Development Consent Order [REP3-004]**. The final LEMP, which would be approved by the Local Planning Authority prior to commencement will include habitat monitoring and management plans for each of the Environmental Areas. Off-site BNG will be secured by legal agreement and managed by third-party providers in accordance with the habitat management and monitoring plan prepared for the off-site location. Natural England is in agreement with the approach taken by the Project which is reflected in **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**.

## The Norfolk Local Nature Recovery Strategy

- 2.2.5 The Norfolk Local Nature Recovery Strategy (LNRS) was published in October 2025, after the submission of the application. Notwithstanding, the draft versions of the LNRS were available prior to submission and was therefore considered by the Project.
- 2.2.6 The Applicant will consider the Norfolk (Essex and Suffolk) LNRSs as part of the off-site BNG selection process, where sites are available, and appropriate to the Project. This off-site selection process would take into consideration the potential for wider habitat connectivity and enhancement across the three counties, as well as specific areas of importance to biodiversity. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.
- 2.2.7 The below information details how the LNRS has informed the proposals for the Norwich Substation Environmental Area, with reference to **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]** and **7.1 Biodiversity Net Gain Report [APP-299]**:
- 2.2.8 **Norwich Substation Environmental Area** (Norfolk LNRS): The existing woodland strip along the southern boundary has been identified by the LNRS as offering potential for Deciduous Woodland Restoration [PM02]. As part of the indicative landscape plan and BNG assessment this area has been identified as retained woodland to be enhanced, aligning with the LNRS. Woodland planting is proposed in the south east corner, to connect the woodland strip to the south of the boundary and Dunston Hills; two areas of woodland identified in the LNRS as potential areas for Deciduous Woodland Restoration [PM02]. The condition of the existing scrub habitat in the Environmental Area is also proposed to be improved. The woodlands and scrub habitats are to be linked with new planting to create an ecological network that is bigger, better and more joined up to provide benefits to biodiversity in alignment with the goals of the Norfolk LNRS.

## 2.3 Suffolk County Council

- 2.3.1 In their response to the Examining Authority's Written Questions 1 [REP3-086] Suffolk County Council advised that their Local Impact Report [REP1-178] identified relevant planning policies. Following a review, it was noted that relevant Suffolk Minerals and Waste Local Plan policies had been captured and assessed.
- 2.3.2 The Suffolk County Council Local Impact Report [REP1-178] did identify a number of policies from the Babergh and Mid Suffolk Joint Local Plan which had not been part of the assessment presented in the 5.7 Policy Compliance Document [APP-086] or 8.4.2 Policy Compliance **Tracker [REP1-133]**. The relevant policies from the Babergh and Mid Suffolk Joint Local Plan are set out in Table 2.1 below.

## 2.4 Babergh and Mid Suffolk District Council

- 2.4.1 In their response to the Examining Authority’s Written Questions 1 [REP3-089] Babergh and Mid Suffolk District Councils did not respond to Question GEN 1.3.
- 2.4.2 The Suffolk County Council **Local impact report [REP1-178]** did identify a number of policies from the Babergh and Mid Suffolk Joint Local Plan which had not been part of the assessment presented in the **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**. For completeness, these policies are set out below.

Table 2.1 Signposting of policy wording of any relevant adopted or emerging local plan policy (Babergh and Mid Suffolk District Council’s)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Babergh and Mid Suffolk Joint Local Plan – Part 1</b>		
SP07 Tourism	<ol style="list-style-type: none"> <li>1. New sustainable tourism development that supports the tourism role of the settlements across Babergh and Mid Suffolk will be encouraged, where appropriate to the scale, character and nature of their locality.</li> <li>2. Historic, recreational and landscape-based tourism proposals that demonstrate protection of the historic and natural environment will be supported.</li> </ol>	The impacts of the Project as they relate to tourism are covered in <b>6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]</b> . Paragraph 15.7.17 of Chapter 15 states that while it is acknowledged that there are significant residual visual changes, construction traffic noise, and changes in journeys and amenity at particular locations anticipated as a result of the Project, these effects are not expected to affect the wider area as a whole and are unlikely to deter visitors or substantially alter the appeal of the destination for tourists.
SP08 Strategic Infrastructure Provision	<ol style="list-style-type: none"> <li>1. The Councils will work with the relevant partners in supporting and enabling the delivery of key strategic infrastructure projects affecting both the plan area and beyond, which include:               <ol style="list-style-type: none"> <li>a) Infrastructure for transport (including sustainable transport modes) along the strategic transport corridors (including the delivery of the ISPA Transport Mitigation</li> </ol> </li> </ol>	The Applicant has reviewed the policy wording and considers that due to there being no residual permanent significant effects that Points 1) a-e (inclusive) and 2) are not directly relevant to the Project. With regard to Point 3, the Applicant has prepared and shared with the local authorities, Heads of Terms regarding a unilateral undertaking (‘UU’) to be given by National Grid to the Local Planning Authorities along the Project route under section

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Strategy) to avoid and mitigate any adverse effects, and achieve net environmental gains;</p> <ul style="list-style-type: none"> <li>b) A district wide education expansion programme to match projected population growth;</li> <li>c) Protected Habitats Mitigation Zones;</li> <li>d) The provision of essential water supply and water recycling infrastructure, including an upgrade from 2032 to the Hartismere water supply infrastructure network; and</li> <li>e) Improvements and expansions to electronic communication networks and high-quality digital infrastructure.</li> </ul> <p>2. All development will also need to make provision for appropriate contributions towards community infrastructure.</p> <p>3. The required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, other Developer Contributions and where appropriate, funding assistance from the Councils / other provider organisations.</p>	<p>106 of the Town and Country Planning Act 1990 ('s.106 UU'), relating to obligations designed to secure off-site planting required as a result of the 3:1 replanting commitment. A s.106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering the off-site planting, as it allows greater flexibility to draft detailed obligations and secures strong enforcements for the benefit of the local planning authorities receiving the s.106 UU.</p>
LP12 Tourism and Leisure	<ul style="list-style-type: none"> <li>1. Proposals for new tourism and leisure facilities, or improvements/extensions to existing facilities, will be supported where they: <ul style="list-style-type: none"> <li>a) Improve the Districts' ability to attract and cater for visitors, increase local employment opportunities, enhance the vitality of places and provide for environmental improvements;</li> <li>b) Improve the range, quality and accessibility of facilities;</li> <li>c) Are accessible by public transport and facilitates walking and cycling, whilst providing appropriate parking and</li> </ul> </li> </ul>	<p>The effects on Recreation and Leisure are set out in <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b> and the associated management measures are set out in <b>7.6 Outline Public Rights of Way Management Plan [APP-329]</b>. These include the proposed management regime and the indicative duration of impact.</p> <p>The overall PRow strategy is to maintain access along PRows at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. In accordance with</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>access, and ensuring the associated traffic movement would not compromise highway safety;</p> <p>d) Include facilities which are open to the wider community, to enhance both accessibility and the range of facilities available;</p> <p>e) Respect the character of the landscape by having regard to landscape guidance that supports the development plan; and</p> <p>f) Follow a hierarchy of seeking firstly to avoid impacts, secondly mitigating for impacts so as to make them insignificant on the local ecology, biodiversity, trees and hedgerows, or thirdly as a last resort compensate for losses that cannot be avoided or mitigated.</p> <p>2. In addition to the criteria above, proposals outside settlement boundaries may be supported where the proposal:</p> <p>a) Increases access, enjoyment and interpretation of the countryside, appropriately, sensitively and sustainably;</p> <p>b) Improves accessibility for existing places, which are not well served by public transport; and</p> <p>c) Is of an appropriate scale for their context.</p>	<p>mitigation measure GG07 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>, any PRow that is affected by construction works, that has been confirmed as requiring reinstatement with the Local Highway Authority, will be reinstated prior to reopening to the reasonable satisfaction of the Local Highway Authority PRow Officer. Post-construction site condition surveys will be undertaken by the Main Works Contractor(s) after construction and reinstatement and the results of these and any remediation will be discussed with the landowner and the relevant PRow Officer, prior to handover.</p>
LP25 Energy Sources, Storage and Distribution	<p>1. Renewable and low carbon, decentralised and community energy generating proposals will be supported subject to:</p> <p>a) The impact on (but not limited to) landscape, highway safety, ecology, heritage, residential amenity, drainage, airfield safeguarding and the local community having been fully taken into consideration and where appropriate, effectively mitigated;</p> <p>b) Where renewable or low carbon energy designs are to be incorporated within a development, an integrated</p>	<p>The Applicant notes this policy in support of renewable and low carbon energy. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a Critical National Priority (CNP) for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>approach being taken, using technology that is suitable for the location and designed to maximise operational efficiency without comprising amenity;</p> <p>c) The impact of on and off-site power generation infrastructure being acceptable, having regard to other policies in this Plan;</p> <p>d) The provision of mitigation, enhancement and compensation measures when necessary; and</p> <p>e) Approval of connection rights, and capacity in the UK power network, to be demonstrated as part of the planning application (where applicable).</p> <p>2. The relevant LPA will normally use conditions attached to planning consents for energy development schemes to ensure the site is restored when energy generation ceases or becomes non-functioning for a period of six months.</p> <p>3. Where proposals for renewable and low carbon energy impact on nature conservation sites, the Areas of Outstanding Natural Beauty, or the setting of heritage assets (including conservation areas), the applicant must be able to convincingly demonstrate that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the District or for community initiatives within the area which it is intended to serve. This includes providing underground power lines and cabling.</p>	<p>The Environmental Statement (Volume 6 of the application) provides an assessment of the likely significant effects in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The scope of the assessment was undertaken in accordance with <b>6.19 Scoping Report [APP-288 – APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b>.</p> <p><b>Volume 6 Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]</b> incorporates comprehensive baseline data and applies assumptions to assess worst-case scenarios. Moreover, post-consent control mechanisms are standard industry practice. The Environmental Statement assesses the Limits of Deviation within the ‘sensitivity testing’ section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed.</p> <p>Effects on nationally designated landscapes are considered in <b>6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]</b>, which presents the assessment of effects of the Project on the special qualities of Dedham Vale National Landscape.</p> <p>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting as an embedded mitigation measure to minimise impacts on its setting, as set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p> <p>With regard to aviation, <b>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]</b> recognises the Project represents a new obstacle within the proximity of aerodromes, explaining the primary aim of the Applicant’s assessments as being to evaluate safety,</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>operational and capability impacts arising as a result of potential aircraft collision with or avoidance of the obstacle (paragraphs 15.3.3 and 15.3.22 refer). Other risks to aircraft considered include risk of bird strike, induced wind turbulence, and potential impacts of electric and magnetic fields (EMF) on aircraft systems, resulting from the Project (paragraphs 15.3.43. to 15.3.48 refer). Appendix 15.2 explains how, during the evolution of the Project’s design, the identification of potential aviation impacts resulting from the Project has prompted the evaluation and incorporation of design changes to minimise adverse risk effects, where possible, in accordance with NPS EN-1 (2024) paragraph 5.5.50. The Applicant’s position is that changes have been implemented where appropriately justified by the detail and quantified extent of potential aviation impacts evidenced through assessments, recognising these impacts to be varied for each aerodrome in scope. A position that suggests any increase in aviation safety risk is unacceptable and cannot be tolerated does not adhere to the Civil Aviation Authority’s risk management system guidance principles.</p> <p>The Applicant has consulted the operators of those GA aerodromes identified within the Aviation Impact Study Area in preparing its assessment of aviation impacts, in accordance with EN-1 (2024) paragraph 5.5.39. Paragraph 15.3.13 of <b>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]</b> further describes this operator engagement and its focus on understanding safeguarding concerns to inform development of the Project’s design, as well as confirming the acceptability of the design and/or agreeing reasonable alternative or additional impact mitigation measures.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
LP26 Water Resources and Infrastructure	<p>Development will be supported where it:</p> <ol style="list-style-type: none"> <li>1. Conforms to the principle of Holistic Water Management including the use of appropriate water efficiency and re-use measures, together with surface water drainage which provides community and environmental benefits;</li> <li>2. Considers its impact on water resources and the capacity of water supply network infrastructure, taking into account the effects of climate change;</li> <li>3. Demonstrates the applicant has consulted with the relevant authority regarding wastewater treatment and that capacity within the foul sewerage network and receiving water recycling centre is available or can be made available in time to serve the development;</li> <li>4. Separates foul and surface water flows;</li> <li>5. Complies with the relevant statutory environmental body policy on culverts; and</li> <li>6. The proposal will not result in any adverse effect (either through construction and / or operation) on the integrity of the Protected Habitats Sites and designated AONBs.</li> </ol>	<p>Assessment of effects on Hydrology, Land Drainage and Flood Risk (<b>6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]</b> have been undertaken in accordance with <b>6.19 Scoping Report [APP-288 – APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> and in line with the requirements of national and local policy and guidance. Assessments have been scoped through engaging with the Environment Agency and the Lead Local Flood Authorities (LLFAs) and have been informed by a range of data sources, including outputs from Environment Agency flood models. <b>7.9 Flood Risk Assessment [APP-331]</b>, and <b>7.10 Water Framework Directive Assessment [APP-332]</b>, have been reviewed by the Environment Agency and the LLFAs prior to submission and their feedback has been incorporated into the documents. General agreement has also been reached regarding the conclusions of these assessments.</p> <p>An updated Drainage Strategy has been produced and submitted at Deadline 4 (<b>8.2 Drainage Strategy [Revision B]</b>). The strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled and also covers proposals for foul water management. The strategy report appends calculations to quantify runoff rates/discharge limits and the sizing of drainage storage and attenuation features.</p>

## 2.5 Essex County Council

- 2.5.1 In their response to the Examining Authority's Written Questions 1 [REP3-077] Essex County Council deferred to the relevant Local Planning Authorities to identify relevant planning policies. Essex County Council did include a signpost to planning policies noted in their **Local Impact Report [REP1-161]**. The policies and relevant development plan documents have been included in assessments presented in **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**.

## 2.6 Colchester City Council

- 2.6.1 In their response to the Examining Authority's Written Questions 1 [REP3-076] Colchester City Council considered that the correct Reg 18 policies have been reviewed by the Applicant in **8.4.2 Policy Compliance Tracker [REP1-133]**.
- 2.6.2 In reviewing the Colchester **Local Impact Report [REP-156]** it was identified that there were policies which had not been included in the assessment presented in **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**. For completeness these policies are set out below. Colchester City Council also identified Neighbourhood Plan policies which they considered to be of relevance to the Project. Table 1.7 includes an assessment of the Project against policies contained in the West Bergholt, Marks Tey and Eight Ash Green Neighbourhood Plans.

Table 2.2 Signposting of policy wording of any relevant adopted or emerging local plan policy (Colchester City Council)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Colchester Borough Local Plan 2017 – 2033 Section 1</b>		
Policy SP2: Recreational disturbance Avoidance and Mitigation Strategy (RAMS)	Contributions will be secured from development towards mitigation measures in accordance with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS).	<p>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b> which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area.</p> <p>Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and, therefore, mitigation in the form of compensation planting is proposed.</p> <p>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat.</p> <p>The Project aims to deliver a 10% net gain in biodiversity which requires off site biodiversity units to be purchased.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy SP3: Spatial Strategy for North Essex	<p>Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel. In Section 2 of its Local Plan each local planning authority will identify a hierarchy of settlements where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs. Beyond the</p>	<p>National Grid will consider projects that align with the LNRs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. It is likely that this will include projects that support the Essex Green Infrastructure Strategy. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature.</p> <p>A contribution by the Project to the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy is therefore not required.</p> <p>The Applicant notes the locations identified for future development and growth within Colchester.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation.</p> <p>With regard to Coalescence, the Applicant is aware of Boxted Neighbourhood Plan Policy LC1 which states that <i>‘Developments in Boxted parish which can be demonstrated to be sustainable and which do not materially</i></p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>main settlements the authorities will support diversification of the rural economy and conservation and enhancement of the natural environment. As part of the sustainable strategy for growth, the Tendring / Colchester Borders Garden Community will be developed and delivered at the broad location shown on Key Diagram 10.2 and on the Colchester and Tendring Local Plans Policies Maps. This new community will provide a strategic location for homes and employment within the Plan period in North Essex. The expectation is that substantial additional housing and employment development will be delivered in the Garden Community beyond the current Local Plan period.</p>	<p><i>reduce the green gap between Boxted and urban Colchester will be supported. This must reflect the requirements of Policy SB1 in respect of development outside of settlement boundaries'</i></p> <p>The Project is routed through the Green Gap identified in Figure 5.2 of the Boxted Neighbourhood Plan. The Applicant notes that the objective of the policy is to ensure that the growth of Colchester urban area does not serve to reduce the gap between Colchester and Boxted, thereby eroding Boxted's function as a rural settlement. The proposed pylons constitute permanent vertical structures, they do not amount to settlement growth nor alter the defined edge of settlements. Accordingly, the scheme does not undermine the core objective of preventing coalescence.</p>
Policy SP5: Employment	<p>A strong, sustainable and diverse economy will be promoted across North Essex with the local planning authorities pursuing a flexible approach to economic sectors showing growth potential across the Plan period. In order to meet the requirements for office, research &amp; development, industrial, storage and distribution uses and to maintain appropriate flexibility in provision to meet the needs of different sectors, Section 2 of each plan will allocate employment land to ensure that provision is made within the ranges set out in the table below. Hectares of employment land required for office, research &amp; development, industrial, storage and distribution uses:</p>	<p>The Applicant notes the locations identified for future development and growth within Colchester.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocations and relevant planning applications.</p>

Local Policy Reference	Policy Wording		How the Project has had regard to Local Planning Policy
	Baseline	Baseline Higher Growth Scenario	
	Braintree	20.9	43.3
	Colchester	22.0	30
	Tendring	12.0	20.0
	North Essex	54.9	93.3
Policy SP6: Infrastructure and Connectivity	<p>Infrastructure &amp; Connectivity</p> <p>All development must be supported by the provision of the infrastructure, services and facilities that are identified to serve the needs arising from the development. The requirements in section A of this policy apply only to the Tendring / Colchester Borders Garden Community, whilst the remaining sections B, C, D and E apply to all allocations and development proposals in the North Essex Authorities area.</p> <p>A. Tendring / Colchester Borders Garden Community</p> <p>1. The Development Plan Document (DPD) for the Tendring / Colchester Borders Garden Community will include:</p> <p>a) An infrastructure delivery strategy and phasing plan that sets out how infrastructure, services and facilities will be provided. Infrastructure delivery will align with each development phase and be supported by suitable mechanisms to deliver the infrastructure both on and off-site;</p> <p>b) Details of the design and delivery of Route 1 of the rapid transit system, and a programme for the integration of the garden community into the system. The route will be designed to accommodate future route enhancements and technology improvements; and</p>		<p>The Applicant notes that Point A is not of relevance to the Project.</p> <p>With regard to Point B, Transportation and Travel: <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> and <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> identifies other developments which together with the Project could result in a cumulative impact to the highway network. <b>7.11 Transport Assessment [APP-333]</b> assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low-level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>c) Target modal shares for each transport mode and details of sustainable transport measures to support their achievement.</p> <p>2. Before any planning approval is granted for development forming part of the Tendring / Colchester Borders Garden Community, the following strategic transport infrastructure must have secured planning consent and funding approval:</p> <p>a) A120-A133 link road: and</p> <p>b) Route 1 of the rapid transit system as defined in the North Essex Rapid Transit System: From Vision to Plan document (July 2019).</p> <p>3. Sustainable transport measures will be provided from first occupation at the Tendring / Colchester Borders Garden Community to support the achievement of the target modal shares as defined in the DPD for the garden community.</p> <p>4. Other strategic infrastructure requirements for the Tendring / Colchester Borders Garden Community are set out in sections D, E and F of Policy SP9, and will be further defined in the DPD for the garden community.</p> <p>B. Transportation and Travel</p> <p>The local planning authorities will work with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to deliver the following;</p> <ul style="list-style-type: none"> <li>• Changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles;</li> <li>• A comprehensive network of segregated walking and cycling routes linking key centres of activity;</li> </ul>	<p>With regard to Point C, Social Infrastructure (with specific regard to Health and Wellbeing, Table 10.5 of <b>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b> highlights that changes in air quality can disproportionately affect particular vulnerable populations including children, older people and people with pre-existing health conditions and disabilities. It is also noted that people in low-income households have poorer health outcomes as they have less resources available for them to stay healthy. Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> describes potential impacts resulting from a change in air quality from construction activities (for example construction dust) which have the potential to adversely impact the health of local residents. The assessment draws on the findings of the air quality assessment set out in <b>6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]</b>. This models effects on sensitive receptors, which include homes and social infrastructure such as schools. <b>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b> concludes that although the sensitivity of vulnerable population groups, with particular reference to pregnant women, children, older people, those with existing health conditions and those in low-income households, is high, effects are limited to the construction phase of the Project, and any exposure would be small scale and short-term, with minor / negligible effects reported for construction dust, construction traffic and Non-Road Mobile Machinery. With the implementation of standard mitigation measures, the risk to human health arising from construction dust would be low, resulting in a negligible and not significant effect. A range of methods to mitigate</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>• Improved urban and inter-urban public transport, and new and innovative ways of providing public transport, including: <ul style="list-style-type: none"> <li>– high quality rapid transit networks and connections in and around urban areas with links to the new garden community;</li> <li>– maximising the use of the local rail network to serve existing communities and locations for large-scale growth;</li> <li>– a bus network providing a high-frequency, reliable and efficient service, integrated with other transport modes serving areas of new demand;</li> <li>– promoting wider use of community transport schemes;</li> </ul> </li> <li>• Increased rail capacity, reliability and punctuality, and reduced overall journey times by rail;</li> <li>• New and improved road infrastructure and strategic highway connections to reduce congestion and provide more reliable journey times along the A12, A120 and A133, specifically: <ul style="list-style-type: none"> <li>– Improved access to and capacity of junctions on the A12 and other main roads;</li> <li>– A dualled A120 from Braintree to the A12.</li> </ul> </li> <li>• Innovative strategies for the management of private car use and parking including the promotion of car clubs and car sharing, and provision of electric car charging points.</li> </ul> <p>C. Social Infrastructure</p> <p>The local planning authorities will work with relevant providers and developers to facilitate the delivery of a wide range of social infrastructure required for healthy, active and inclusive communities, minimising negative health and social impacts, both in avoidance and mitigation, as far as is practicable</p>	<p>potential air quality effects have been proposed within <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p> <p>Section D, Digital Connectivity: This section of the policy is not of direct relevance to the Project.</p> <p>Section E, Water and Waste Water: The Applicant is currently engaged in ongoing discussions with Anglian Water seeking to resolve the interactions detailed by the respondent within the Statement of Common Ground between both parties.</p> <p>The appointed Main Works Contractor(s) would provide additional information to Anglian Water on the non-domestic water needs of the Project as this information becomes available during the detailed design stage of the Project. <b>5.5 Consents and Licences Required Under Other Legislation [APP-084]</b> stipulates that Water Connections Agreement applications would be submitted by the appointed contractor for supply of mains water, should the Project receive development consent and prior to relevant works.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p><i>Education</i></p> <p>Sufficient school places will be provided in the form of expanded or new primary and secondary schools together with early years and childcare facilities that are phased with new development, with larger developments setting aside land and/or contributing to the cost of delivering land for new schools where required.</p> <p>Practical vocational training, apprenticeships, and further and higher education will be provided and supported.</p> <p><i>Health and Wellbeing</i></p> <p>Healthcare infrastructure will be provided as part of new developments of appropriate scale in the form of expanded or new facilities including primary and acute care; pharmacies; dental surgeries; opticians; supporting community services including hospices, treatment and counselling centres.</p> <p>Require new development to maximise its positive contribution in creating healthy communities and minimise its negative health impacts, both in avoidance and mitigation, as far as is practicable.</p> <p>The conditions for a healthy community will be provided through the pattern of development, good urban design, access to local services and facilities; green open space and safe places for active play and food growing, and which are all accessible by walking, cycling and public transport.</p>	
	<p>D. Digital Connectivity</p> <p>Comprehensive digital access to support business and community activity will be delivered through the roll-out of ultrafast broadband across North Essex to secure the earliest availability of full fibre connections for all existing and new developments (residential and non-residential). All</p>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>new properties will allow for the provision for ultrafast broadband in order to allow connection to that network as and when it is made available.</p>	
	<p>E. Water &amp; Waste water</p> <p>The local planning authorities will work with Anglian Water, Affinity Water, the Environment Agency and developers to ensure that there is sufficient capacity in the water supply and waste water infrastructure to serve new development. Where necessary, improvements to water infrastructure, waste water treatment and off-site drainage should be made ahead of the occupation of dwellings to ensure compliance with environmental legislation.</p>	

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### Colchester Borough Local Plan 2017 – 2033 Section 2

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<p>Policy SG1: Colchester's Spatial Strategy</p>	<p>Throughout the Borough, growth will be located at the most accessible and sustainable locations in accordance with the spatial strategy for North Essex set forth in Policy SP3 in Section One and with the spatial hierarchy set out in Table SG1. The spatial hierarchy ranks areas of the Borough in order of their sustainability merits and the size, function and services provided in each area. The centres hierarchy is set out in Policy SG3. Development will be focused on accessible locations to reduce the need to travel. Development will be supported where a real travel choice is provided and sustainable travel for different purposes is promoted throughout the day. This spatial hierarchy focuses growth on the urban area of Colchester, reflecting its position as the main location for jobs, housing, services, and transport. Within this urban area, the Central Area of Colchester including the Town Centre is the most sustainable location for new development given that it can accommodate higher densities reliant on its good access to public transport and concentrated mix of uses</p>	<p>The Applicant notes the locations identified for future development and growth within Colchester.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation.</p>
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Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>which minimise the need to travel. The surrounding built up, North, South, East and West (including Stanway) urban areas of Colchester provide the next sub-level of well-connected, sustainable locations for growth. The next tier of preferred growth includes a Garden Community straddling the boundary with Tendring District Council providing a new greenfield sustainable community which will grow gradually, over time, extending beyond the plan period. The second tier also includes existing Sustainable Settlements within the Borough most of which are planned for appropriate growth. In the remaining Other Villages and Countryside of Colchester, new development will only be acceptable where it accords with policies OV1 and OV2. New development in the open countryside will be required to respect the character and appearance of landscapes and the built environment and preserve or enhance the historic environment and biodiversity to safeguard the rural character of the Borough.</p>	
<p>Policy SG7: Infrastructure Delivery and Impact Mitigation</p>	<p>All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms. Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):</p> <ul style="list-style-type: none"> <li>(i) Financial contributions towards new or expanded facilities and the maintenance thereof;</li> </ul>	<p>In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. The mitigation measures proposed within the Project will be secured through Requirements in Schedule 3 of the Draft DCO <b>[REP3-004]</b>.</p> <p>The Applicant has prepared and shared with the local authorities, Heads of Terms regarding a unilateral undertaking ('UU') to be given by National Grid to the Local Planning Authorities along the Project route under section 106 of the Town and Country Planning Act 1990 ('s.106</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>(ii) On-site provision (which may include building works);</li> <li>(iii) Off-site capacity improvement works; and/or</li> <li>(iv) The provision of land.</li> </ul> <p>Developers will be expected to contribute towards the delivery of relevant infrastructure. They will either make direct provision or will contribute towards the provision of local and strategic infrastructure required by the development either alone or cumulatively with other developments. Measures required to mitigate the impacts of recreational disturbance on habitats sites will be delivered as detailed in the adopted Essex Coast Recreational disturbance Avoidance and Mitigation Strategy. Small sites can have a cumulative effect on infrastructure and proportional contributions will be sought from all developments where this is demonstrated to be the case. Developers and landowners must work positively with the Local Planning Authority, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with published policies and guidance.</p> <p>Exceptions to this policy will only be considered whereby:</p> <ul style="list-style-type: none"> <li>(i) It is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm;</li> <li>(ii) A fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and landowner receipt necessary for the development to proceed;</li> <li>(iii) Full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and</li> </ul>	<p>UU'), relating to obligations designed to secure off-site planting required as a result of the 3:1 replanting commitment.</p> <p>The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% BNG. This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG will be secured through legal agreements (either s106 agreements or conservation covenant agreements) between the appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable).</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development.</p>	
<p>Policy DM6: Economic Development in Rural Areas and the Countryside</p>	<p>The Local Planning Authority will protect Local Economic Areas in rural Colchester that provide an economic function both on allocated sites shown on the policies maps and at other rural locations that provide a similar function. Sites and premises currently used or allocated for employment purposes in rural parts of the Borough will be safeguarded for appropriate economic uses to ensure local residents have access to local job opportunities without the need to travel. Proposals for alternative uses will be supported where they comply with policy SG4. Within allocated rural Local Economic Areas and on rural sites providing an economic function, the following uses are considered appropriate in principle:</p> <ol style="list-style-type: none"> <li>I. Offices to carry out any operational or administrative functions- E(g)(i); Research and development of products or processes -E(g)(ii); Industrial processes - E(g)(iii), general industrial (B2), storage and distribution (B8);</li> <li>II. Repair and storage of vehicles and vehicle parts, including cars, boats and caravans; and</li> <li>III. Other employment-generating uses, such as those related to recreation and tourism, which meet local needs and/or promote rural enterprise.</li> </ol> <p>The following additional considerations will also be taken into account where relevant:</p> <p>(A) Conversion and re-use of existing rural buildings: Proposals for acceptable uses will only be supported where the building is capable of re-use without significant rebuilding, and the building is deemed to be desirable for retention. In the case of former agricultural or forestry</p>	<p>The Applicant notes the locations identified for future development and growth within Colchester.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>buildings of recent construction (less than 10 years), it will also need to be demonstrated that the original need for the building was genuine and that it is no longer required for agricultural or forestry purposes.</p> <p>(B) Extension of existing rural employment buildings: Proposals for extensions will be supported where these are limited to plans which are essential to the operation of an established business. All extensions shall be accommodated satisfactorily in terms of design, scale and appearance within the existing employment site boundary.</p> <p>(C) Replacement rural employment buildings: Replacement buildings will only be supported where the existing development is visually intrusive or otherwise inappropriate in its context and a substantial improvement in the landscape and surroundings will be secured through replacement. New buildings should not significantly increase the scale, height and built form of the original building. There is a presumption that heritage assets will be retained rather than replaced.</p> <p>(D) New rural employment buildings: Proposals will only be supported in exceptional cases where there are no appropriate existing buildings, there is no available employment land in the locality and a site/area specific business need has been adequately demonstrated.</p> <p>(E) Expansion of an existing business: Proposals to expand an existing employment use into the countryside will only be supported in exceptional cases where there is no space for the required use on the existing site, the need has been adequately demonstrated, and the proposals are essential to the operation of an established business on the site. Consideration must be given to the relocation of the business to available land within a Strategic or Local Economic Area or alternative rural site providing an</p>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>economic function and in a more sustainable location. In all cases, any new development will be expected to have adequate landscape mitigation to compensate for any additional impact upon the surrounding countryside. Proposals in close proximity to a habitats site must demonstrate through HRA screening that the scheme will not lead to likely significant effects to the integrity of the habitats site. Where this cannot be ruled out a full appropriate assessment will be required to be undertaken. Additionally, any planning application within 400 metres of a habitats site must provide mechanisms to prevent fly tipping, the introduction of invasive species and vandalism.</p>	
<p>Policy DM5: Tourism, Leisure, Culture and Heritage</p>	<p>Development for new and extended visitor attractions, leisure, cultural and heritage facilities along with visitor accommodation (including hotels, bed and breakfast accommodation, self-catering accommodation, holiday lodges, static and touring caravans and camping sites) will be supported in suitable locations subject to minimising their impact on, and demonstrating how the development could make a positive contribution to neighbouring areas and provide biodiversity enhancements. Proposals for tourism, leisure, culture and heritage development should be appropriate in scale and function to the surrounding area; be accessible by a choice of means of transport; and not cause significant harm to the amenity of people living and working nearby. Proposals that are likely to have an adverse impact on the integrity of habitats sites or the Dedham Vale AONB will not be supported. In locations where residential use would be inappropriate, developments of visitor accommodation will be limited by condition or legal agreement to holiday use only and/or certain periods of the year in order to prevent permanent or long-term occupation.</p>	<p>The wording of this policy is specifically relevant to the provision of new and extended tourism facilities and as such is not directly relevant to the Project. The response however does seek to address wider matters regarding impacts on existing tourism and on the integrity of the National Landscape.</p> <p>The impacts of the Project as they relate to tourism are covered in <b>6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]</b>. Paragraph 15.7.17 of Chapter 15 states that while it is acknowledged that there are significant residual visual changes, construction traffic noise, and changes in journeys and amenity at particular locations anticipated as a result of the Project, these effects are not expected to affect the wider area as a whole and are unlikely to deter visitors or substantially alter the appeal of the destination for tourists.</p> <p>The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>While there would be significant effects during construction due to the installation of underground cables, these would reduce and be not significant during operation. There would be no significant effects on the National Landscape as a result of the proposed new East Anglia Connection Node (EACN) Substation or overhead lines. The assessment of effects of the Project on Dedham Vale National Landscape is set out in <b>6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]</b>.</p> <p>Through routeing, siting and design development, the Applicant has sought to avoid or if unavoidable reduce, as far as practicable, impacts on biodiversity and in particular features of high ecological value, such as local, national (e.g. SSSIs) and internationally (e.g. Ramsar and SPAs) designated sites. Potential direct and indirect impacts on ecological designated sites within the Study Area have been considered within <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. SPAs and the associated impact on birds has also been considered within <b>5.3 Habitats Regulations Assessment Report [APP-082]</b>.</p> <p><b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> and <b>7.2 Outline Code of Construction Practice [REP3-025]</b> contain a list of relevant good practice measures to avoid or reduce impacts on designated sites and include specific mitigation measures as appropriate to ensure no significant residual effects.</p>

## 2.7 Tendring District Council

- 2.7.1 In their response to the Examining Authority's Written Questions 1 [REP3-094] Tendring District Council noted that they had already dealt with changes to policy, including the ongoing work on our emerging Local Plan to 2042 in their **Local Impact Report [REP1-182]**. The relevant Local Plan Policies, including the emerging development plan have been assessed in **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**.

## 2.8 Braintree District Council

- 2.8.1 In their response to the Examining Authority's Written Questions 1 [REP3-091] Braintree District Council invited the Applicant to update the compliance tracker to reflect that Braintree District Council has progressed the Local Plan Review to Regulation 18 stage. It is noted that Braintree District Council referenced the March 2025 consultation. It is assumed that this is a typo and that the correct reference should be March 2026. An Assessment of the emerging local plan policies is set out below.
- 2.8.2 Braintree District Council also identified Neighbourhood Plan policies in their **Local Impact Report [REP1-148]** which they considered to be of relevance to the Project. Table 1.7 includes an assessment of the Project against policies contained in the Kelvedon Neighbourhood Plan.

Table 2.3 Signposting of policy wording of any relevant adopted or emerging local plan policy (Braintree District Council)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Braintree District Council Local Plan Review 2041 Preferred Options Consultation (Regulation 18) (March 2026)</b>		
Policy LPR 2 – Development Boundaries	<i>“...Development outside development boundaries will be confined to uses appropriate to the countryside whilst also protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils to protect the intrinsic character and beauty of the countryside”.</i>	<p>The content of this policy is noted by the Applicant. The Project is routed away from development boundaries within Braintree.</p> <p>The Environmental Statement (Volume 6 of the application) provides an assessment of the likely significant effects in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The scope of the assessment was undertaken in accordance with <b>6.19 Scoping Report [APP-288 – APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b>.</p> <p><b>Volume 6 Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]</b> incorporates comprehensive baseline data and applies assumptions to assess worst-case scenarios. Moreover, post-consent control mechanisms are standard industry practice. <b>Volume 6 Environmental Statement [APP-123 to APP-287, AS-026 and AS 068]</b> assesses the Limits of Deviation within the ‘sensitivity testing’ section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed.</p>
Policy LPR 26 – SGL – Kings Dene – North, West and South West of Kelvedon	Land to the north west and south west of Kelvedon, as shown on the Proposals Map, is allocated for a high-quality comprehensively planned sustainable extension to Kelvedon and Feering based upon Garden Communities Principles that will provide a significant amount of new housing and employment development, and will maximise opportunities for active and sustainable travel, in a landscaped led design	<p>The Applicant has made representations to the Braintree Regulation 18 Consultation with reference to this proposed allocation.</p> <p>The Applicant considers that there should be no reason why the proposed allocation for the Kings Dene site cannot be successfully developed alongside the Norwich to Tilbury Project. However, in order to ensure that this is the case</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>setting. An Outline Planning Application including Parameter Plans, Design Code and Illustrative Masterplan (including the phasing of development and delivery of infrastructure) will be collaboratively prepared for the entire site. Collaboration with site promoters, landowners, Braintree District Council, Essex County Council, Parish Councils and other key stakeholders (including community engagement). This document will be further informed by public participation in the process. To ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the approved masterplan and will not prejudice the implementation of the site as a whole. The development is expected to be planned and delivered in a holistic way and not as smaller portions of separate development. Development proposals which could compromise the delivery of an identified Strategic Growth Location will be resisted.</p> <p><i>(Author Note: The full wording of the Planning Policy LPR 26 has not been replicated due to its length. A copy of the full wording is provided in Appendix A of this compliance tracker).</i></p>	<p>and that developers are aware of the matters to consider when developing in proximity to overhead lines, the Applicant strongly recommends that the relevant policies refer to both The Electricity Safety, Quality and Continuity Regulations 2002 and National Grid’s Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines which will assist the developers in this regard. In addition to this the Applicant is willing to meet with both the Local Planning Authority and the site developers to discuss the development of the sites to ensure a mutually beneficial outcome.</p>
<p>Policy LPR 52 – Sustainable Transport</p>	<p><i>“Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks... Developers may be required to produce Travel Plans, Transport Assessments and Statements as considered appropriate by the Local Planning Authority. The Essex County Council Development Management Policies (2011) provide further detail on requirements relating to accessibility and access including Travel Plan, Transport Assessment and Statement thresholds for each land use category....</i></p>	<p>It is considered that the wording of this policy is of relevance primarily to the construction phase of the Project. Section 7.6 of <b>7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met.</p>

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	<p><i>Highway works (S.278) and/or financial contributions (S.106) from development proposals will be sought, where appropriate and viable, towards achieving the above objectives including the construction of new or improvements to the existing PROW network and/or off-site cycleway and footpaths, startup and operation of a Car Club and additional off-site public car parking, if required... Development which would adversely affect the character of, or result in loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist or horse rider use”.</i></p>	<p>The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non compliance and would follow the non-Compliance procedure in Section 6.3 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>.</p> <p>The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contactor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.</p> <p>7.6 Outline Public Rights of Way Management Plan [APP-329] identifies routes affected by the Project, including duration of impact and management measures (which relate to temporary closures and diversions). The Outline PROW Management Plan would be developed into a final document by National Grid’s appointed Main Works</p>

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Policy LPR 53 – Parking Provision	Development will be required to provide vehicle and cycle parking in accordance with the Essex Vehicle Parking Standards 2024 or as superseded.	<p>Contractor(s) to discharge Requirement 4 of 3.1 Draft Development Consent Order [APP-056] ahead of the commencement of any construction activities. A regular dialogue would be maintained with PRow Officers throughout the construction period of the Project. It is noted that other development would apply PRow management measures to minimise disruption, including diversions</p> <p>The Applicant considers that the Essex Parking Standards do not include any relevant standards for the nature of the Project. However, the Applicant would wish to highlight that Section 7.6 of <b>7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> sets the initiatives that will be implemented by the TPC to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met.</p> <p>The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non compliance and would follow the non-Compliance procedure in Section 6.3 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>.</p>

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Policy LPR 55 – New Road Infrastructure	<p><i>“The following schemes are proposed in the District and will be safeguarded from development:</i></p> <ul style="list-style-type: none"> <li><i>a) A131 Halstead Bypass (The bypass route has not been subject to recent survey or design and is therefore shown as a diagrammatic corridor only, which will be subject to change)</i></li> <li><i>b) Second road access into Witham Station Car Park from Station Road</i></li> <li><b>c) A120 Braintree to Marks Tey route option D</b></li> </ul> <p><i>The following schemes are proposed to support development allocated in the Local Plan:</i></p> <ul style="list-style-type: none"> <li><i>d) Maldon Road Bypass, Hatfield Peverel</i></li> <li><i>e) A new road connecting Springwood Drive with Panfield Lane</i></li> <li><i>f) Provision of a new connection between Inworth Road and London Road.</i></li> <li><i>g) Galleys Corner improvements</i></li> <li><i>h) Improved connections to Kings Dene</i></li> <li><i>i) Improved connections to Hatfield Peverel and Witham”</i> </li></ul>	<p>The emerging Local Plan includes a proposal to safeguard proposed highway route between the A120 Braintree to Marks Tey National Grid understands that the proposals to improve the A120 between Braintree and the A12 are supported by Braintree District Council to help facilitate the delivery of new homes and economic growth.</p> <p>Feedback on this safeguarded route was provided by the Applicant in their response to the Regulation 18 Consultation in April 2026. It was noted that the safeguarded route interacts with the Project. The Applicant would welcome the opportunity to discuss the highway proposals if this highway progresses.</p>
Policy LPR 57 – Built and Historic Environment	<p><i>“The Council will promote and secure a high standard of design and layout in all new development and the protection and enhancement of the historic environment in order to:</i></p> <ul style="list-style-type: none"> <li><i>a) Respect and respond to the local context, especially in the District's historic areas, where development may affect the setting of listed buildings non-designated heritage assets contained in Local Lists and Neighbourhood Plans, and other buildings of historic or architectural significance, conservation areas, registered parks and gardens, scheduled monuments and areas of high archaeological and landscape sensitivity...</i></li> </ul>	<p><b>5.15 Design Development Report [APP-122], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127], 7.15 Design and Access Statement [REP2-020] and 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354]</b> provide an overview of the design rationale for the Project. They set out a summary of the Applicant’s approach to good design and demonstrate how the Applicant has responded to the physical, environmental and socio-economic context of the overhead line route and cable end sealing compound and substation locations and responded to consultation. <b>6.11 Environmental Statement</b></p>

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	<ul style="list-style-type: none"> <li>b) <i>Create built environments which are safe and accessible to everyone and which will contribute towards the quality of life in all towns and villages</i></li> <li>c) <i>Create good quality built environments in commercial and business districts and in the public realm as well as in residential areas ...”</i></li> </ul>	<p><b>Chapter 11 - Historic Environment [AS-068]</b> assesses the likely significant cultural heritage effects that could result from the Project. The Applicant has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The Environmental Statement chapter concludes that the Project would not result in substantial harm to any listed buildings.</p> <p><b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> concludes that within Braintree, the project would result in permanent adverse magnitude of impact to three designated assets. This impact is considered to be on the lower spectrum of less than substantial. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. This harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.</p>

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Policy LPR 60 – Provision for Open Space, Sport and Recreation	<p><i>“...Existing open space, sports and recreational buildings shall not be built on unless a robust and up to date assessment has been undertaken which has clearly demonstrated that they are surplus to requirements or the proposed development is otherwise compliant with this policy as a whole. For open space, ‘surplus to requirements’ should include consideration of all the functions that open space can perform. Not all open space, sport and recreational land and buildings are of equal merit and some may be available for alternative uses. Developers will need to consult the local community and demonstrate that any proposals are widely supported by them. In considering planning applications which could impact on open space, the Council shall weigh any benefits being offered to the community against the loss of open space that will occur. The Council will seek to ensure that all proposed development takes account of, and is sensitive to, the local context. In this regard, the Council shall consider applications with the intention of:</i></p> <ol style="list-style-type: none"> <li data-bbox="353 906 1249 975"><i>I. Avoiding any erosion of recreational function and maintaining or enhancing the character of open spaces</i></li> <li data-bbox="353 986 1249 1054"><i>II. Ensuring that open spaces do not suffer from increased overlooking, traffic flows or other encroachment</i></li> <li data-bbox="353 1066 1249 1174"><i>III. Protecting and enhancing those parts of the rights of way network that may benefit open space and access to the wider countryside</i></li> <li data-bbox="353 1185 1249 1254"><i>IV. Mitigating the impact of any development on biodiversity and nature conservation”.</i></li> </ol>	<p>The Project has sought to avoid works within areas of designated open space throughout. Table B.1 of Appendix B Open Space Assessment of <b>5.6 Planning Statement [APP-085]</b> provides an overview of open spaces that are located within or adjacent to the Order Limits of the Project and an assessment of the impacts of the Project. In Braintree, the Project interacts with seven areas of open space. There will be no permanent loss of open space in these locations, in accordance with Policy LPR 60. However, there will be short term impacts due to construction works and oversail of overhead lines may also result in hedgerow and trees being managed in certain locations. The short term impacts are not considered to conflict with Policy LPR 60. Where there is oversail, the character of an open space may be impacted which is identified as a consideration in LPR 60. However, the benefits of the Project are considered to outweigh these impacts, which are limited in their incidence and impact, and will not undermine the overall quality of provision of open space in Braintree.</p> <p>The Applicant notes that the Council agreed with the findings of the Open Space Assessment in their responses to the ExAQ1 <b>[REP3-091]</b>.</p>

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Policy LPR 62 – Layout and Design of Development	<p><i>“The Council will seek a high standard of layout and design in all developments in the District and encourage innovative design where appropriate. Planning permission will be granted where the relevant following criteria are met:</i></p> <p><i>a) Proposals will be expected to achieve a layout and design that responds positively to local character, heritage, landscape and context, while allowing for innovation in appropriate circumstances. The scale, layout, height and massing of buildings and overall elevation design should reflect or enhance the area's local distinctiveness and shall be in harmony with the character and appearance of the surrounding area; including their form, scale and impact on the skyline and the building line.</i></p> <p><i>b) Buildings and structures should be of high architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm and comprise details and materials that complement, but not necessarily replicate, the local architectural character</i></p> <p><i>c) There shall be no unacceptable impact on the amenity of any nearby properties including on privacy, overshadowing, loss of light and overbearing impact, including when taking into account topography and overlooking of existing residential properties....</i></p> <p><i>d) The public realm including buildings, open areas, circulation spaces, and other townscape and landscape features shall be of a high standard of design and materials and they shall be consistent with affordable long term maintenance which is appropriate to the character and historic value of the area</i></p> <p><i>e) Designs shall be sensitive to the need to conserve and enhance local features of architectural, historic and</i></p>	<p>The Applicant has reviewed this policy and whilst not all 20 subsections are directly relevant to the Project, an assessment has been made against points a, b, c, e, f, g, h, k and m.</p> <p>In response to a) and b), a clear narrative explaining how the Project’s design has evolved through an iterative good-design process is provided within:</p> <ul style="list-style-type: none"> <li>• <b>7.15 Design and Access Statement [REP2-020]</b></li> <li>• <b>5.15 Design Development Report [APP-122]</b></li> <li>• <b>7.16 Design Approach for Site-Specific Infrastructure (DASSI) [APP-354]</b>. This iterative process has been informed by extensive stakeholder engagement, engineering and environmental surveys, technical assessments and refinement. It has culminated in the identification of Limits of Deviation through careful routing and siting – now narrowed to detailed design and construction considerations.</li> </ul> <p>The design for the Project is set out in detail in <b>Environmental Statement Chapter 4 - Project Description [APP-130]</b>, which describes the design submitted within the application. This should be read alongside <b>Environmental Statement Chapter 3 - Alternatives [APP-127]</b>, which documents the key environmental factors that were considered in the optioneering and design evolution process (from strategic options to the proposal subject to the application for development consent) and summarises the design process captured in the following reports:</p> <ul style="list-style-type: none"> <li>• <b>7.18 2022 - Corridor and Preliminary Routeing and Siting Study [REP1-068]</b></li> </ul>

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	<p><i>landscape importance, particularly within Conservation Areas and in proximity to heritage assets</i></p> <p>f) <i>Development proposals will incorporate measures for environmental sustainability throughout the construction, occupation and demolition of the development; in relation to energy conservation, water efficiency, waste separation (internal and external), climate change, flood resilience and resistant construction and the use of materials with low overall energy requirements</i></p> <p>g) <i>Designs shall incorporate details of waste storage and collection arrangements, including provision for recycling, within the site to ensure that the impact on amenity and character are considered and recycling is optimised...</i></p> <p>h) <i>Designs and layouts shall promote a safe and secure environment, crime reduction and prevention, and shall encourage the related objective of enhancing personal safety with the maximum amount of natural surveillance of roads, paths and all other open areas and all open spaces incorporated into schemes</i></p> <p>i) <i>Landscape proposals should normally consist of native plant species and their design shall promote and enhance local biodiversity and historic environmental assets. Biodiversity net gain in line with the requirements of national policy through the provision of new priority habitat where appropriate is encouraged. Development layouts must be appropriately designed to accommodate structural tree and hedge planting and ensure that future interference with highway safety, roads, pavements, services and properties is minimised</i></p> <p>j) <i>The design and level of any lighting proposals for the purpose of access to and the safety and security of a</i></p>	<ul style="list-style-type: none"> <li>• <b>7.19 Strategic Options Backcheck and Review (2023) [APP-357]</b></li> <li>• <b>7.20 2023 - Design Development Report for the Project [APP-358]</b></li> <li>• <b>7.21 2024 - Design Development Report for the Project [APP-359]</b></li> <li>• <b>7.17 Strategic Options Backcheck and Review (2025) [APP-355]</b></li> <li>• <b>5.15 Design Development Report for the Project [APP-122]</b></li> <li>• <b>7.15 Design and Access Statement [REP2-020]</b></li> <li>• <b>7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354]</b></li> </ul> <p>The Design Development Reports have been prepared to explain the reasons for taking forward certain changes and explaining why other changes are not taken forwards. Professional judgement was used to determine which changes are judged to be the main ones covered with the remainder covered within <b>5.1 Consultation Report [APP-066]</b>.</p> <p>The Applicant has given due consideration to the costs and benefits of feasible alternatives to the overhead line in line with Paragraph 2.9.14 of NPS EN-5. Furthermore, the Applicant has continued to backcheck and review its proposal. After taking into consideration the socio-economic, environmental, technical and cost factors, the proposal that best meets the needs case set out above is an onshore reinforcement between Norwich Main Substation and Tilbury Substation via Bramford Substation, a new Tilbury North Substation. National Grid is satisfied that no</p>

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	<p><i>development will need to be in context with the local area, comply with national policy and avoid or minimise glare, spill and light pollution on local amenity, intrinsically dark landscapes and nature conservation.</i></p> <p><i>k) Use of sustainable modes of transport are promoted in the design and layout of new development. The highway impact of the development shall be assessed and the resultant traffic generation and its management shall seek to address safety concerns. Developments which will result in a severe impact upon the highway network (taking into account cumulative impacts) will be refused unless they can be effectively mitigated</i></p> <p><i>l) Proposals for the long-term maintenance of public areas and landscaping are included</i></p> <p><i>m) The development proposed should not have a detrimental impact on the safety of highways or any other public right of way, and its users...</i></p> <p><i>n) Developments shall be legible and accessible to all and create or contribute to a coherent sense of place that is well articulated and visually interesting and welcoming</i></p> <p><i>o) Developments shall be permeable and well-connected to walking and cycling networks, open spaces and facilities</i></p> <p><i>p) Residential developments shall provide a high standard of accommodation and amenity for all prospective occupants</i></p> <p><i>q) Developments, particularly flats, should avoid single aspect dwellings that are: North facing; exposed to noise categories C or D; or contain two or more bedrooms. Where single aspect dwellings are proposed, the designer should demonstrate how good levels of ventilation, daylight and privacy will be provided to each habitable room</i></p>	<p>additional undergrounding is justified beyond what is proposed. Accordingly, the Project considers that it has address the policy requirements set out in Paragraphs 2.9.23 to 2.9.25 (inclusive) of NPS EN-5.</p> <p>The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.</p> <p>In response to c), the full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>6.13A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>, <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]</b> and <b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 to APP-234]</b>. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the</p>

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	<p>r) <i>The provision of private outdoor amenity space shall be provided having regard to the standards set out in the Essex Design Guide, or its successor, and shall be accessible, usable and well-related to the development</i></p> <p>s) <i>Development proposals should demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development.</i></p> <p>t) <i>Safe, attractive and inclusive streets, spaces and buildings should be created that are accessible and easy to navigate for all users, including children, older people and those with a disability.”</i></p>	<p>maturity of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed in accordance with the mitigation hierarchy and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid’s statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.</p> <p>In response to e), the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets through the process of design development, and by embedding measures into the design of the Project. <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> reports the assessment of the likely significant cultural heritage effects that could result from the Project. Within Braintree District Council the Project avoids direct interaction with the Coggeshall, Silver End, Kelvedon, White Notley, Terling Conservation Areas (noted as being in proximity to the Project).</p>

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		<p>In response to f), the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project.</p> <p><b>5.6 Planning Statement [APP-085]</b> explains how good design has been embedded in the project from the outset.</p> <p>In response to g), the Project is supported by <b>7.2 Outline Site Waste Management Plan – Appendix B of the Code of Construction Practice [REP2-016]</b> which sets out project-specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.</p> <p>In response to h), whilst not directly tied to the wording of the policy, the Applicant would highlight that the Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.</p> <p>In response to k) and m), <b>7.11 Transport Assessment [APP-333]</b> has been produced for the Project. The Transport Assessment has been developed in line with DLUHC guidance (Travel Plans, Transport Assessments and Statements) and relevant TAG (formerly WebTAG) principles. <b>7.11 Transport Assessment [APP-333]</b> has</p>

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		<p>assessed the highway impacts of the Project including cumulative impacts and impacts on road safety. Stage 1 Road Safety Audits have been undertaken on the preliminary designs of the proposed site access points and crossover points. <b>7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]</b> sets out the road safety audit process followed.</p> <p>The following documents set out the Project’s proposed traffic and transport mitigation measures: <b>7.2 Outline Code of Construction Practice [REP3-025]</b>, <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>, <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320]</b>, <b>7.6 Outline Public Rights of Way Management Plan [Revision B]</b> and <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>. <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> contains the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Outline Construction Worker Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. The Outline Construction Worker Travel Plan will be developed into a final detailed Construction Worker Travel Plan by the Main Works Contractor(s) should development consent be awarded.</p>

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Policy LPR 63 – Conservation Areas	<p>The Council will encourage the preservation and enhancement of the character and appearance of designated Conservation Areas and their settings. These include the buildings, open spaces, landscape and historic features and views into, out from and within the constituent parts of designated areas. Built or other development within or adjacent to a Conservation Area and affecting its setting will be permitted provided that all the following criteria are met:</p> <ul style="list-style-type: none"> <li>a) Where the proposal enhances the character, appearance and essential feature of the Conservation Area or its setting</li> <li>b) Details of existing buildings which make a positive contribution to the character and appearance of the Conservation Area will be retained</li> <li>c) Building materials are of high quality and appropriate to the local context</li> </ul>	<p>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets through the process of design development, and by embedding measures into the design of the Project.</p> <p><b>Environmental Statement 6.11 Chapter 11 - Historic Environment [AS-068]</b> reports the assessment of the likely significant cultural heritage effects that could result from the Project. Within Braintree District Council the Project avoids direct interaction with the Coggeshall, Silver End, Kelvedon, White Notley, Terling Conservation Areas (noted as being in proximity to the Project).</p>
Policy LPR 60 – Archaeological Evaluation, Excavation and Recording	<p>Where important archaeological remains are thought to be at risk from development, or if the development could impact on a Scheduled Monument or Registered Park and Garden, the developer will be required to arrange for an archaeological evaluation of the site to be undertaken and submitted as part of the planning application. The Essex Historic Environment Record should be the primary source for assessment for archaeological potential. The evaluation will assess the character, significance and extent of the archaeological remains and will allow an informed decision to be made on the planning application. Such assessments should be proportionate to the importance of the site and a programme of archaeological investigation may be necessary for sites likely to contain significant archaeology.</p> <p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved</p>	<p><b>Environmental Statement 6.11 Chapter 11 Historic Environment - [AS-068]</b> assesses the likely significant cultural heritage effects that could result from the Project. The Applicant has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. <b>6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]</b> provides a detailed overview of the heritage assets within the defined Study Areas for Braintree District Council (Section E of the Project route) and a discussion of the prehistoric and</p>

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	<p>in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p> <p>Where archaeological potential is identified but there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to conditions ensuring an appropriate programme of archaeological investigation, recording, reporting and archiving, prior to development commencing. There will be a requirement to make the result of these investigations publicly accessible.</p>	<p>historical development of the landscape within this section of the Project. The Baseline Report found that the Project would effect two Scheduled Monuments which will result in the loss of significance due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The impact is predicted to be negligible/low adverse magnitude of impact. The Project would not affect any Registered Park and Gardens within Braintree District Council area. Mitigation measures to reduce impacts on archaeology are set out in <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.</p>
<p>Policy LPR 73 – Natural Environment and Green Infrastructure</p>	<p>Development proposals must take available measures to ensure the protection and enhancement of the natural environment, habitats, biodiversity and geodiversity of the District and to be acceptable, also taking climate change and water scarcity into account in their design. This will include protection from pollution. Proposals inside the District which are likely to adversely affect, either individually or cumulatively, International or Nationally designated nature conservation sites within and outside the District will not normally be acceptable.</p> <p>The Council will expect all development proposals, where appropriate, to contribute towards the delivery of new Green Infrastructure which develops and enhances a network of multi-functional spaces and natural features throughout the District. This will be proportionate to the scale of the proposed development and the rural or urban context. The Council will support and encourage development which contributes to the District’s existing Green Infrastructure and</p>	<p><b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> presents the assessment of likely significant ecology and biodiversity impacts. It concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during both the construction and operation (including maintenance) within Braintree District Council (Section E of the Project route). With regard to the second part of the policy the Project would help to contribute towards the delivery of new Green Infrastructure through the provision of mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is</p>

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	<p>where possible, enhances and protects networks and adds to their functions. It will secure additional provision where deficiencies have been identified. Open space and green infrastructure may in some instances be required to provide alternatives to European sites and that such sites should be designed and managed appropriately to maximise their potential effectiveness in this role. Proposals which undermine these principles will not be acceptable.</p>	<p>currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required, the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>.</p>
<p>Policy LPR 74 – Protected Sites</p>	<p><b>International Designations:</b> Sites designated for their international importance to nature conservation; including Ramsar sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC), should be protected from development likely to have an adverse affect on their integrity whether they are inside or outside the District.</p> <p>Proposals which are considered to have a likely significant effect on these sites will require an Appropriate Assessment (AA) in line with European and domestic legislation. Developers should provide information sufficient to inform this assessment. Planning permission will only be granted if, in light of the AA, it can be ascertained that the development would not adversely affect the integrity of these sites or, if there are no alternative solutions, imperative reasons of overriding public interest can be demonstrated.</p> <p>In accordance with the Habitats Regulations, development proposals should follow the avoid-mitigate-compensate hierarchy. Where this cannot be achieved, development proposals will not be permitted.</p> <p>Residential developments must contribute to the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS) where they fall within the Zones of Influence of international designations as defined in the RAMS.</p>	<p>To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared [APP-082] to inform the SoS’s HRA for the Project.</p> <p>The HRA report submitted with the application comprises the technical information to inform the SoS Stage 1: Screening and Stage 2: Appropriate Assessment of the Project. The <b>HRA report [APP-082]</b> has concluded that an adverse effect on the integrity of the European Sites (following the implementation of mitigation) can be ruled out. There were 28 European Sites identified within the Study Area for the HRA Report. No Likely Significant Effects (LSEs) were identified for 23 sites which were screened out at the pre screening stage. Five sites were taken forward for detailed screening, no LSEs were identified for the Thames Estuary and Marshes SPA and Ramsar Site. Stage 1 of the HRA process identified the potential for LSE’s from the Project (on its own or in-combination with other plans or projects) on three European sites:</p> <ul style="list-style-type: none"> <li>• Norfolk Valley Fens SAC</li> <li>• Stour and Orwell Estuaries Ramsar Site</li> <li>• Stour and Orwell Estuaries SPA.</li> </ul>

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	<p>Larger site allocations will be required to provide sufficient greenspace to mitigate alone impacts on Essex Coast Habitat Sites.</p> <p><b>Nationally Designated Sites:</b> Sites designated for their national importance to nature conservation; including Sites of Special Scientific Interest (SSSIs) should also be protected from development which is likely to adversely affect the features for which they are designated. Where necessary, developers should therefore ensure that sufficient assessment of potential impacts to SSSIs is also submitted with any planning application.</p> <p><b>Locally Designated Sites:</b> Proposals likely to have an adverse effect on a Local Wildlife Site (LWS), Local Nature Reserve (LNR) and Special Roadside Verge will not be permitted unless the benefits of the development clearly outweigh the harm to the nature conservation value of the site. If such benefits exist, the developer will be required to demonstrate that impacts will be avoided, and impacts that cannot be avoided will be mitigated on-site.</p> <p><b>Protected Species, Priority Species and Priority Habitat:</b> Proposals that result in a net gain in priority habitat will be supported in principle, subject to other policies in this plan. Where priority habitats are likely to be adversely impacted by the proposal, the developer must demonstrate that adverse impacts will be avoided, and impacts that cannot be avoided are mitigated on-site. Where residual impacts remain, off-site compensation will be required so that there is no net loss in quantity and quality of priority habitat in Braintree District. Where there is a confirmed presence or reasonable likelihood of protected species or priority species being present on or immediately adjacent to a development site, the developer will be required to undertake an ecological survey and will be</p>	<p>The potential LSEs relate to construction activities. All operation (and maintenance) LSEs from the Project (alone or in combination with other plans and projects) have been screened out. In the absence of mitigation, direct LSEs through changes in hydrology could not be screened out for the Norfolk Valley Fens SAC or the Stour and Orwell Estuaries SPA and Ramsar Site. In the absence of mitigation, indirect LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement), changes in air quality and changes in hydrology could not be screened out at functionally linked land (“FLL”) for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. Two areas of FLL are present within the Order Limits, which have been used by significant numbers of roosting Lapwing and Golden Plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures within the <b>Outline CoCP [REP3-025]</b>, secured through Requirement 4 of the <b>Draft DCO [REP3-004]</b> are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to air quality on FLL associated with the waterbird assemblage qualifying feature. This is primarily due to the FLL consisting of arable habitat which is not considered to be vulnerable to air quality effects.</p>

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	<p>required to demonstrate that an adequate mitigation plan is in place to ensure no harm to protected species and no net loss of priority species.</p> <p>Proposals resulting in the loss, deterioration or fragmentation of irreplaceable habitats such as ancient woodland or veteran trees will not normally be acceptable unless the need for, and benefits of the development in that location clearly outweigh the loss.</p> <p><b>All Development Proposals:</b> In all cases a precautionary approach will be taken where insufficient information is provided about avoidance, management, mitigation and compensation measures. Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary.</p>	<p>Furthermore, the <b>Outline Dust Management Plan, appended to the Outline CoCP [APP-304]</b>, secured through Requirement 4 of the <b>Draft DCO [REP3-004]</b> will be adhered to during the works. The Appropriate Assessment concluded that there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to habitat loss, fragmentation and disturbance on FLL associated with the waterbird assemblage qualifying feature, due to sufficient availability of alternative suitable habitat within the 5 km IRZ that would support lapwing and golden plover that would be temporarily displaced by the construction works. This conclusion was agreed with Natural England</p> <p><b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> presents the assessment of likely significant ecology and biodiversity impacts. It concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during both the construction and operation (including maintenance). The Project has been designed in a way which prioritises the retention and conservation of significant trees, woodlands and orchards. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features, therefore <b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy Final Issue B [REP3-032]</b> has been prepared following Natural England updating their ancient woodland inventory in July 2025 (Essex) and November 2025 (Suffolk).. In relation to Ancient Woodlands, the physical extent of each ancient woodland</p>

along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** lists the Ancient Woodlands identified within a 200 m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 17 ancient woodland parcels (ten within ancient woodlands themselves and seven within the 15 m buffer RPA).

Specific Project commitments have been made as standard mitigation, to remove impacts to ancient woodlands. As a result of these Project commitments impacts associated with seven ancient woodlands have been completely removed (Middle Wood (Offton), Stonefield Strip, Sheepcote's Wood, Wenham Grove, Botneyhill Wood, North-west of Great Horkesley and Millers Wood). No works will be undertaken (in line with Project commitments B21 to B24, B28, B33 and B34 set out within the Outline CoCP (document reference 7.2) (Revision D) within or within 15 m of these ancient woodlands.

While impacts have been minimised where practicable, complete removal of impacts to ten ancient woodlands are unavoidable, as the proposed works relate to either:

- The removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m RPA (Bushey Grove (Section B), Round Wood (Section B), Rivenhall Thicks (Section E), Writtle-Writtlepark Woods (Section F), North-east of

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		<p>Bladen’s Wood (Section G), Little Bladen’s Wood (Section G) and Clapgate Wood (Section G))</p> <ul style="list-style-type: none"> <li>• The use of an existing feature to be used by the Project, such as an existing drainage ditch or existing track (Horkesley Plantation (Section D) and Edney Woods (Section F)), or</li> <li>• The implementation and maintenance of sufficient electrical clearance associated with the 400 kV overhead line, the alignment of which is constrained by other ancient woodland to the east (Lodgefield Row (Section B)).</li> </ul> <p>Horkesley Plantation (Section D), and an additional ancient woodland known as Wenham Grove (Section C), will also be subject to woodland enhancement measures associated with the landscape proposals at the relevant Environmental Area. This adjacent woodland planting is expected to deliver a long-term significant benefit to the woodlands at Wenham Grove (Section C) and Horkesley Plantation (Section D). Mitigation measures associated with these sites have been proposed to ensure no significant long term residual effects on ancient woodland are encountered as a result of the Project (commitments B25, B27, B29, B30-B32, and B35 to be set out within the Outline CoCP (document reference 7.2) (Revision C). Rainbow Wood and Ashen Shaw is affected by the LTC project. The Norwich to Tilbury Project will have no direct effects on Rainbow Wood and Ashen Shaw ancient woodland, the Project will affect the area of proposed the LTC Development Consent Order mitigation planting. An alternative tree planting area has been included within the Project Order Limits, which will provide space for</p>

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		<p>this ancient woodland mitigation adjacent to the retained areas of Rainbow Wood LWS.</p> <p>A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in <b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b>. With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. An arboricultural survey was also undertaken between May 2023 and May 2025. A full record of the identified veteran trees is included in Table 7.3 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>. The Ancient Woodland and Veteran Tree Strategy Report states that based on the existing overhead line alignments without considering the LoD this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B18 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>). Ancient Woodland and Veteran Tree Strategy Report details the management outcomes for veteran trees. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis and then approved alongside the final LEMP by the relevant planning authorities. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with the Applicant. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.</p>

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Policy LPR 75 – Tree Protection	<p>The Council will consider the protection of established healthy trees which offer significant amenity value to the locality by:</p> <ul style="list-style-type: none"> <li>a) Assessing the value and contribution made by trees to the Conservation Areas in which they are located when determining S211 notifications for works to trees, including their removal</li> <li>b) Serving Tree Preservation Orders in response to an objection to such a notification or in other circumstances as detailed below</li> </ul> <p>Prominent trees which contribute to the character of the local landscape and are considered to have reasonable life expectancy will be protected by tree preservation orders particularly if they are considered to be under threat from removal.</p> <p>Trees which make a significant positive contribution to the character and appearance of their surroundings will be retained unless there is a good arboricultural reason for their removal for example they are considered to be dangerous or in poor condition. Similarly alterations to trees such as pruning or crown lifting should not harm the tree or disfigure it; any tree surgery should be carried out to reflect BS3998:2010 (as superseded).</p> <p>When considering the impact of development on good quality trees the Council will expect developers to reflect the best practice guidance set out in BS5837:2012 (as amended). The standard recommends that trees of higher quality are a material consideration in the development process.</p> <p>Where trees are to be retained on new development sites there must be a suitable distance provided between the established tree and any new development to allow for its continued wellbeing and ensure it is less vulnerable to</p>	<p>The Applicant has undertaken <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]</b> in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction. This has identified trees that offer significant amenity value which the Project has sought to avoid, where practicable. In addition, <b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b> has been produced to detail the environmental measures that will be implemented to avoid, minimise, mitigate and compensate the ancient and/ or veteran features likely to be impacted during construction and operation. Within Braintree District, the Arboricultural Impact Assessment notes that a number of high and moderate quality features will be affected. A total of 11 individual trees and five groups of trees will be removed; 23 groups of trees will also be partly removed; seven individual trees and three groups of trees will be affected / managed as part of the proposals and 39 individual trees and three groups of trees will be retained with protection measures. The Project has been designed to avoid impacting on trees and vegetation where reasonably possible. However, unavoidable tree loss will be compensated through the implementation of landscape design including new tree planting (refer to <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> which sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. The Project would contribute to the aims of Braintree District’s Tree Strategy by maintaining where possible trees through sensitive routeing to avoid tree loss, and compensating any</p>

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	<p>pressures from adjacent properties for its removal. Planning conditions will be applied to protect trees during development. New landscape proposals for tree planting on development sites should reflect the recommendations set out in BS5837:2012 (as amended) and BS8545:2014 (as superseded).</p>	<p>loss of trees through compensatory planting at a 3:1 ratio for individual trees thus promoting a sustainable tree population. In addition, the Project would use best practice in arboriculture and forestry as set out in <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>.</p>
<p>Policy LPR 76 – Protection, Enhancement, Management and Monitoring Biodiversity</p>	<p><i>“Development proposals shall provide for the protection of biodiversity and the mitigation or compensation of any adverse impacts. Additionally, enhancement of biodiversity should be included in all proposals, commensurate with the scale of the development. For example, such enhancement could include watercourse improvements to benefit biodiversity and improve water quality, habitat creation, wildlife links (including as part of green or blue infrastructure) and building design which creates wildlife habitat (e.g. green roofs, bird or bat boxes as integral parts of buildings in partnership with organisations such as The Swift Conservation Group and Essex Wildlife Trust). Proposals shall have regard to the River Pant and Blackwater Restoration Plan... If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission should be refused. Proposals shall have regard to the Local Nature Recovery Strategy and take opportunities to design layouts to take advantage of the opportunities shown, particularly strategic opportunity areas”.</i></p>	<p>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b> which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the</p>

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Policy LPR 77 – Landscape Character and Features	<p>In its decision-making on applications, the Local Planning Authority will take into account the different roles and character of the various landscape areas including valued landscapes in the District, and recognise the intrinsic character and beauty of the countryside, in order to ensure that any development permitted is suitable for the local context. Proposals will be supported where they protect, and where possible, enhance positive features that contribute to local distinctiveness and sense of place, and to conserve and enhance the landscape setting of settlements.</p> <p>Proposals for new development should be informed by the South Suffolk and North Essex Clayland National Character Area Profile, and be sympathetic to, the character of the landscape as identified in the District Council's Landscape Character Assessments. Proposals which may impact on the landscape such as settlement edge, countryside or large schemes will be required to include an assessment of their impact on the landscape and should not be detrimental to the</p>	<p>construction and operation (including maintenance). In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.</p> <p>The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>, <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]</b>, <b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Part 1 of 2 [APP-233]</b> and <b>6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]</b>. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field</p>

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	<p>distinctive landscape features of the area such as trees, hedges, woodlands, grasslands, ponds and rivers. Development which would not successfully integrate into the local landscape will not be permitted.</p> <p>Where development is proposed close to existing features, it should be designed and located to ensure that the condition and future retention/management will not be prejudiced but enhanced where appropriate.</p> <p>When considering proposals which affect the Dedham Vale National Landscape, the council will consider how the proposals will further the statutory purposes of the protected landscape.</p> <p>Additional landscaping including planting of native species of trees, hedgerows and other flora may be required to maintain and enhance these features.</p> <p>The restoration and enhancement of the natural environment will be encouraged through:</p> <ul style="list-style-type: none"> <li>a) Maximising opportunities for a creation of new green infrastructure and networks in sites allocated for development</li> <li>b) Creating green infrastructure networks to link urban areas to the countryside, and creating and enhancing the biodiversity value of wildlife corridors.</li> </ul> <p>Development proposals which result in harm to the setting of the National Landscape will not be permitted.</p>	<p>boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting and the Environmental Area proposed around Fairstead (EACN side) and Fairstead (Tilbury side) CSE (both located in Braintree District), the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully, and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid’s statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), <i>‘these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure’</i>.</p> <p>With regard to restoration and enhancement of the natural environment, in addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Applicant is seeking to deliver net gain by at least 10% or greater in environmental value, including BNG, on this Project. Further details can be found in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>.</p>

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Policy LPR 78 – Green Buffers	<p>The following areas are identified on the Proposals Map as Green Buffers:</p> <p>Land between Braintree, Rayne, Panfield, Bocking and High Garrett Land between Earls Colne and White Colne Land between Great Notley and Black Notley Land between Witham, Rivenhall and Rivenhall End Land between Sible Hedingham and Castle Hedingham. Land between Hatfield Peverel and Witham Land between Cressing and Braintree Land between Rivenhall/Rivenhall End and Kings Dene.</p> <p>Uses considered appropriate in green buffers include agricultural and forestry development, formal and informal recreation, footpaths and cycle ways, cemeteries, the re-development of suitable brownfield sites, development which relates to an existing use, and the extension or replacement of existing homes. Proposals for strategic infrastructure within green buffers would be supported provided suitable consideration is given to their impact on the surrounding area.</p> <p>Where development is necessary it will have regard to the local landscape character and be of a design, density and layout which minimises the coalescence and consolidation between built areas and preserves the setting of those areas and will minimise the impact of any external lighting to that which is appropriate for safety or security of a development.</p> <p>An assessment of the local landscape and physical separation between settlements will be required, demonstrating that the development is to be located on an area which has the least detrimental impact to the character of the countryside and does not reduce the visually sensitive buffer between settlements or groups of houses.</p>	<p>From a review of the Local Plan inset maps it is not immediately clear whether or not the Project will be routed through areas identified as Green Buffers. The Applicant notes the reference to proposals for strategic infrastructure being supported within green buffers. In addressing that point the Applicant would highlight that the design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.</p> <p>The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>, <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232]</b> and <b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Parts 1 and 2 [APP-233 to APP-234]</b>. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Appropriate landscaping, comprising of local native species, will be required in order to enhance the countryside character of these areas, and encourage biodiversity.</p>	<p>equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.</p>
<p>Policy LPR 79 – Protected Lanes</p>	<p>The District Council will conserve the traditional landscape and nature conservation character of roads designated on the Proposals Map as Protected Lanes, including their verges, banks, ditches and natural features such as hedgerows, hedgerow trees and other structural elements contributing to the historic features of the lanes.</p> <p>Any proposals that would have a materially adverse impact on the physical appearance of these Protected Lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a protected lane, will not be permitted.</p>	<p>Within Braintree there are a number of Protected Lanes in proximity to the Project. The Project has sought to avoid works at Protected Lanes where practicable. However, during construction, works will be required at:</p> <ul style="list-style-type: none"> <li>• Fairstead Road</li> <li>• Fairstead Lodge Road</li> </ul> <p>The above Protected Lanes would be oversailed by the Project and have temporary bellmouths installed where the temporary haul road crosses the lanes. A new access on Fairstead Road would be created to allow permanent access for construction vehicles into the Fairstead (Tilbury Side) Cable Sealing End (CSE) compound and the Fairstead (EACN side) CSE compound.</p> <p><b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b> found that the construction activities would result in the loss of hedgerows, field trees, hedgerow trees, and riparian vegetation which contribute to the character of the landscape. As there will be underground cables associated with the CSE compound and EACN substation replacement tree planting above the cable corridors will not be possible, therefore there will be permanent loss of natural features</p>

above the cable corridors. Compensatory tree planting in other locations within the Order Limits will be delivered to offset the loss of natural features. Although tree planting directly above the cables between Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds could not be reinstated, hedgerows would be replaced across the Landscape Character Area. In the longer term, proposed planting within the Environmental Area around Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds would reduce effects. Localised landscape benefits would arise from the undergrounding of short sections of existing overhead lines. At year 15, proposed planting would be semi-mature, helping to integrate Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds within the surrounding landscape in the middle area. Impacts to Protected Lanes during the operational stage have been discounted from consideration, given that the Applicant has committed to restoring landscape features requiring removal during construction where possible. For instance, historic hedgerows will be restored, as will historic earthworks contributing to the Protected Lane. There will also be no material increase in traffic using the Protected Lanes during the operational stage. Vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border Protected Lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of **7.2 Outline Code of Construction Practice [REP3-025]**. Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement. **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment**

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy LPR 80 – Protecting and Enhancing Natural Resources, Minimising Pollution and	<p>Proposals for all new developments should prevent unacceptable risks from all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Local Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively and after mitigation, there are likely to be unacceptable impacts arising from the development or upon the proposed development in relation to:</p> <ul style="list-style-type: none"> <li>a) The natural environment, general amenity and the tranquillity of the wider rural area</li> <li>b) The health and safety of the public including existing residents, and future occupiers of all new developments</li> <li>c) Air quality</li> <li>d) Surface water and groundwater quality, groundwater source protection areas, drinking water protected zones</li> <li>e) Odour</li> <li>f) Compliance with statutory environmental quality standards</li> <li>g) Noise.</li> </ul>	<p>[APP-228], 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 2 to 4 [APP-230 to APP-232] and 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Part 1 of 2 [APP-233] provides an assessment of the landscape and visual impacts on Protected Lanes.</p> <p>The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified: In relation to light pollution, <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> presents the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these Environmental Statement chapters has been based on the assumptions that, all lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours, meaning in winter this would require working in the dark at either end of the day. For the purposes of the Environmental Statement, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. <b>7.2 Outline Code of Construction Practice [REP3-025]</b> sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Development will be permitted when there is no unacceptable risk due to:</p> <ul style="list-style-type: none"> <li>• Siting on known or suspected unstable land</li> <li>• Siting on land which is known to be or potentially affected by contamination or where the land may have a particularly sensitive end use</li> <li>• The storage or use of hazardous substances</li> </ul> <p>Proposals for development on, or adjacent to land which is known to be potentially affected by contamination, or land which may have a particular sensitive end use, or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels, site investigations and other relevant studies, remediation proposals and implementation schedule prior to, or as part of any planning application.</p> <p>Soil quality must be protected during development to protect good quality land and to protect the ability of soil to allow water penetration by avoiding compaction.</p> <p>In appropriate cases, the Local Planning Authority may impose planning conditions, or through a legal obligation, secure mitigation measures, remedial works and/or monitoring processes.</p>	<p>sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06).</p> <p>In response to (b) <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> details the assessment of the potential residual effects of the Project on Health and Wellbeing.</p> <p>With regard to noise, <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes <b>7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]</b>, which includes embedded, standard (good practice) and additional mitigation measures to avoid or reduce effects including noise and vibration and is secured by Requirement 4 of Schedule 3 to <b>3.1 Draft Development Consent Order [REP3-004]</b>. <b>5.4 Statement of Statutory Nuisance [APP-083]</b> concludes that with mitigation measures in place, no breach of section 79(1) of the Environmental Protection Act 1990 is expected as a result of the Project.</p> <p><b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b> sets out the assessment of impacts on agricultural land, confirming the extent of each land grade (based on the Agricultural Land Classification system) and the extent of each grade required temporarily and as a result of the construction of permanent infrastructure.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy LPR 81 – Climate Change	<p>The Council will adopt strategies to mitigate and adapt to climate change. In addressing the move to a low carbon future for Braintree District, the Council will plan for new development in locations and ways that reduce greenhouse gas emissions. Applicants will be expected to demonstrate that measures to lower carbon emissions, increase renewable energy provision and adapt to the expected impacts of climate change have been incorporated into their schemes, other than for very minor development. Planning permission will only be granted for proposals that demonstrate the principles of climate change mitigation and adaptation into the development. Guidance will be made available by the Council on the contents to be included in the Sustainability Statement. The Council intends the District to meet part of its future energy needs through renewable and low carbon energy sources and will therefore encourage and support the provision of these technologies subject to their impacts on landscape and visual amenity, residential amenities including noise, pollution, heritage assets and their settings, biodiversity and designated nature conservation sites, soils, and impact on the highway, being acceptable.</p>	<p>The Project is needed to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK’s net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. <b>6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]</b> has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities.</p>
Policy LPR 84 – Flooding Risk and Surface Water Drainage	<p>Where development must be located in an area of higher flood risk, it must be designed to be flood resilient and resistant and safe for its users for the lifetime of the development, taking climate change and the vulnerability of the residents into account...</p> <p>New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3a will be required to provide</p>	<p><b>7.9 Flood Risk Assessment [APP-331]</b> has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> confirms that the parts of the Project located in Braintree District Council (Section E of the Project route) area are mostly located in Flood Zone 1, comprising of pylons and one CSE</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>sufficient evidence for the Council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development must be located in an area of higher flood risk, it must be designed to be flood resilient and resistant and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents into account.</p> <p>For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site specific Flood Risk Assessment which meet the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account by using the most up to date allowances available.</p> <p>For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.</p> <p>For developments located in areas at risk of fluvial flooding, safe access/egress must be provided for new development as follows in order of preference:</p> <ol style="list-style-type: none"> <li>a) Safe dry route for people and vehicle</li> <li>b) Safe dry route for people</li> <li>c) If a. is not possible a route for people where the flood hazard is low and should not cause risk to people</li> <li>d) If a-c is not possible planning permission will not usually be granted.</li> </ol>	<p>compound. As addressed in <b>7.9 Flood Risk Assessment [APP-331]</b>, there is one pylon proposed in the floodplain in Section E that would need compensatory storage. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The Risk of Flooding from the Surface Water map shows that the majority of land within Section E is at very low risk of surface water flooding. As shown in <b>7.9 Flood Risk Assessment [APP-331]</b>, where there are interactions between the Project and any high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. The Risk of Flooding from Surface Water map shows that most of the land within Section E is at very low risk of surface water flooding. As shown in <b>7.9 Flood Risk Assessment [APP-331]</b>, where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. Detail on the Sequential and Exception Tests are provided in Sections 5.1 and 5.2 of <b>7.9 Flood Risk Assessment [APP-331]</b> submitted as part of the application for development consent. The Project is classified as ‘essential infrastructure’ with respect to flooding vulnerability in the NPPF. The infrastructure which represents the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. <b>7.9 Flood Risk Assessment [APP-331]</b> has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>All new development in Flood Zones 2 and 3 should not adversely affect flood routing and thereby increase flood risk elsewhere.</p> <p>All new development in Flood Zones 2 and 3 must not result in a net loss of flood storage capacity. Where possible opportunities must be sought to achieve an increase in floodplain storage.</p> <p>All more Vulnerable and Highly Vulnerable development within Flood Zones 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change.</p> <p>In areas at risk of flooding at low depths (&lt;0.3m), flood resistance measures should be considered as part of the design and in areas at risk of frequent or prolonged flooding, flood resilience measures should also be included.</p> <p>Where applicable proposals for new development should:</p> <ol style="list-style-type: none"> <li>I. Demonstrate that the scheme does not have an adverse impact on any watercourse, floodplain or flood defence</li> <li>II. Not impede access to flood defence and management facilities iii) Demonstrate that the cumulative impact of development would not have a significant effect on local flood storage capacity or flood flows</li> <li>III. Where appropriate opportunities may be taken to reduce wider flood risk issues by removing development from the floodplain through land swapping</li> <li>IV. Where applicable retain at least an 8m wide undeveloped buffer strip alongside Main Rivers, or at least a 3m buffer strip on at least one side of an Ordinary watercourse, and explore opportunities for riverside restoration</li> </ol>	<p>river floodplains, would be reduced through embedded and good practice measures e.g. commitment reference W07 and Outline Flood Warning and Evacuation Plan as set out in <b>7.2 Outline Code of Construction Practice (Final Issue C) [REP3-025]</b>. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. These commitments would be secured by <b>Requirement 4 in Schedule 3 of the Draft DCO [REP3-004]</b>. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in <b>7.9 Flood Risk Assessment [APP-331]</b>. Above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>V. Ensure there is no adverse impact on the operational functions of any existing flood defence infrastructure and new development should not be positioned in areas which would be in an area of hazard should defences fail.</p> <p>Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.</p>	
<p>Policy LPR 85 – Surface Water Management Plan</p>	<p>The Council will require development to have regard to and contribute positively towards delivering the aims and objectives of the Braintree and Witham Surface Water Management Plan as updated.</p> <p>Developments located in Critical Drainage Areas (CDAs), Local Flood Risk Zones (LFRZs) and for redevelopments of more than one property or area greater than 0.1 hectare should seek betterment to a greenfield runoff rate.</p> <p>All developments in Critical Drainage Areas (excluding minor housing extensions less than 50m<sup>2</sup>) which relate to a net increase in impermeable area must include at least one 'at source' SUDs measure (e.g. water butt, permeable surface). This is to assist in reducing the peak volume of discharge from the site.</p>	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority (LLFA) using suitable SuDS that are maintained for the Project's lifetime. <b>7.9 Flood Risk Assessment [APP-331]</b> states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. In relation to Critical Drainage Areas, the Order Limits avoid encroaching into such areas.</p>
<p>Policy LPR 86 – Sustainable Urban Drainage Systems</p>	<p><i>“... SuDs design quality will be expected to reflect the up-to-date standards encompassed in the relevant BRE and CIRIA standards, Essex County Council SuDs Design Guide (as updated) and Non-Statutory Technical Standards for Sustainable Drainage Systems, to the satisfaction of the Lead Local Flood Authority...”</i></p> <p><i>Surface water should be managed as close to its source as possible and on the surface where practicable to do so.</i></p>	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> describes the good practice measures including sustainable drainage systems (SuDS) for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p><i>Measures such as rain water recycling, green roofs, water butts and permeable surfaces will be encouraged incorporating measures to prevent pollution where appropriate.</i></p> <p><i>Only where there is a significant risk of pollution to the water environment, inappropriate soil conditions and/or engineering difficulties, should alternative methods of drainage be considered. If alternative methods are to be considered, adequate assessment and justification should be provided and consideration should still be given to pre and post runoff rates.</i></p> <p><i>SuDS design should be an integral part of the layout and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application. Only proposals which clearly demonstrate that a satisfactory SuDs layout with appropriate maintenance is possible, or compelling justification as to why SuDs should not be incorporated into a scheme, or are unviable, are likely to be successful.</i></p> <p><i>Contributions in the form of commuted sums may be sought in legal agreements to ensure that the drainage systems can be adequately maintained into the future. The SuD system should be designed to ensure that the maintenance and operation requirements are economically proportionate.</i></p> <p><i>The dual use of land for Sustainable Urban Drainage and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space, and where use as open space does not compromise the efficient and effective functioning of the SuDs in the short or longer term”.</i></p>	<p><b>7.9 Flood Risk Assessment [APP-331]</b> states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b> contains further details on SuDS.</p>
Policy LPR 87 – External Lighting	Proposals for external lighting within development proposals and standalone lighting schemes, will be permitted where all the following criteria are met:	<b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> present

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>a) The lighting is designed as an integral element of the development and shall be capable of adoption by the Highway Authority when it is on the public highway</li> <li>b) Low energy lighting is used in conjunction with features such as movement sensors, daylight sensors and time controls, and hours of illumination shall be controlled</li> <li>c) The alignment of lamps and provision of shielding minimises spillage, glare and glow, including into the night sky</li> <li>d) The lighting intensity is no greater than necessary to provide adequate illumination</li> <li>e) There is no loss of privacy or amenity to nearby residential properties and no danger to pedestrians and road users. Illumination should not result in harm to neighbouring non-residential uses.</li> <li>f) There is no harm to biodiversity, natural ecosystems, intrinsically dark landscapes and/or heritage assets.</li> </ul>	<p>the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these Environmental Statement chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours, meaning in winter this would require working in the dark at either end of the day. For the purposes of the Environmental Statement, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. <b>7.2 Outline Code of Construction Practice [REP3-025]</b> contains relevant good practice measures relating to Ecology and Biodiversity, and Landscape and Visual. These measures include – LV03: Construction lighting will be directional and minimised where possible; GG22: Any activity carried out or equipment located within a temporary construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where reasonably practicable; GG31: Permanent lighting will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task specific lighting will be assessed and considered by all necessary specialists to also so far as is reasonably practicable be directed to reduce intrusion; and B06: Lighting used for construction must be switched-off when not in use and positioned to minimise spill on to adjacent land or retained vegetation.</p>

## 2.9 Chelmsford City Council

2.9.1 In their response to the Examining Authority's Written Questions 1 [REP3-075] Chelmsford City Council identified that the following policies should be stated in full and not abbreviated:

- Strategic Policy S1 – Spatial Principles
- Strategic Policy S4 - Conserving and enhancing the natural environment
- Strategic Policy S9 – Infrastructure requirements
- Policy DM6 - New development in the Green Belt
- Policy DM14 - Non designated heritage assets
- Policy DM18 - Flooding / SUDs
- The response from Chelmsford City Council also noted that the following policies had not been included in the Policy Compliance Document or Policy Compliance Tracker:
  - Strategic Policy S7 – The spatial strategy
  - Strategic Policy S8 – Delivering economic growth
  - Strategic Policy S10 – Securing infrastructure and impact mitigation
  - Policy DM7 - New buildings and structures in the Green Wedge
  - Policy DM8 - New buildings and structures in the rural area
  - Policy DM10 - Change of use (Land and buildings) and Engineering operations
  - Policy DM19 – Renewable and low carbon energy
  - Policy DM27 - Parking standards

2.9.2 An assessment of how the Project has had regard to these policies is set out below.

Table 2.4 Signposting of policy wording of any relevant adopted or emerging local plan policy (Chelmsford City Council)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Chelmsford City Council Local Plan Review (Pre-submission Regulation 19) (Draft Plan February 2025)</b>		
Strategic Policy S1 – Spatial Principles	<p>The Council will require all new development to accord with the following Spatial Principles where relevant:</p> <ul style="list-style-type: none"> <li>a) Locate development at well-connected and sustainable locations</li> <li>b) Protect the Green Belt from inappropriate development</li> <li>c) Promote the use of suitable previously developed land</li> <li>d) Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area</li> <li>e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements</li> <li>f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity</li> <li>g) Locate development to avoid or manage flood risk and reduce carbon emissions</li> <li>h) Ensure development is served by necessary infrastructure and encourage innovation</li> <li>i) Locate development to utilise existing and planned infrastructure effectively</li> <li>j) Ensure development is deliverable.</li> </ul>	<p>The spatial principles set out in this policy aim to manage growth in a sustainable manner Not all elements of the policy are of direct relevant to the Project. Accordingly, the Applicant has sought to respond to points a), b), f), g) and j)).</p> <p>Taking each of the above relevant subpoints in turn, the Applicant would respond as follows:</p> <p>A) The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. At the routeing and siting stage, the Project design process was informed by the guidance of the Holford and Horlock Rules to avoid and reduce impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. Further details are set out in <b>5.6 Planning Statement [APP-085]</b> (see Section 7.2).</p> <p>B) The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. An assessment on the Green Belt can be found in 5.6 Planning Statement [APP-085].</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>The assessment in the Planning Statement concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in <b>5.6 Planning Statement [APP-085]</b>), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of <b>5.6 Planning Statement [APP-085]</b> consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.</p> <p><b>5.6 Planning Statement [APP-085]</b> and National Grid's response to Written Question LUS 1.10 in 8.9.1 Applicant's Responses to First Written Questions <b>[REP3-074]</b> details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-13 also confirms that '...the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:</p> <p>Where development within a Green Belt requires very special circumstances to justify development'.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>F) Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on <b>6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]</b>. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The Applicant has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. <b>5.6 Planning Statement [APP-085]</b> explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. <b>6.13 Environmental Statement Chapter 13 - Landscape</b></p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p><b>and Visual [APP-226]</b> identifies embedded measures relevant to Landscape and Visual including:</p> <ul style="list-style-type: none"> <li>– Sensitive routing and siting of the alignment and Order Limits</li> <li>– Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected</li> <li>– Replacement planting would be undertaken at the earliest opportunity given the right planting season, to mitigate, where practicable, vegetation removed during construction.</li> </ul> <p>With regard to preserving the historic environment, <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> reports the assessment of the likely significant historic environment effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford, the Project would result in a permanent significant effect (considered to constitute less than substantial harm) to three listed buildings and The Langleys Registered Park and Garden.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>G) The Project has sought to avoid and manage flood risk. 6.12 Environmental Statement Chapter 12 - Hydrology and Land Drainage [APP-221] concludes that the Project has sought to avoid siting any infrastructure in areas at risk of flooding. The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project would interact with the high risk zone for operation, the majority of these would be access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of <b>7.9 Flood Risk Assessment [APP-331]</b>) and through standard mitigation measures set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. With respect to carbon emissions <b>6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]</b> the total CO<sub>2</sub>e estimated on the Project is 376,214 tCO<sub>2</sub>e. This is split into 333,4617 tCO<sub>2</sub>e for capital (construction) carbon (which would be spread over the whole construction duration), 39,199 tCO<sub>2</sub>e for transmission losses during 40 years of operation and 3,398 tCO<sub>2</sub>e for Non SF<sub>6</sub> loss through leakage. National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the project development process and require this of its contractors. PAS 2080 is a global standard for managing infrastructure carbon. This framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design,</p>

construction and use. Design optimisation in line with the carbon reduction hierarchy is included below:

- Reduce the elements and materials required for the construction phase of the Project
- Use alternative raw materials and resources, such as those with a higher proportion of recycled content
- Use efficient construction processes, such as manufacture and assembly design.

The Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero.

- J) The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into the EACN Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future, driven by the government's plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator's (NESO) Clean Power 203016 report. The need case is reviewed at each critical stage of the Project's development and without a robust demonstrable need, the Project would be revised or fall away. Currently, the contracted generation as contained in both the National Energy System Operator (NESO) Transmission Entry Capacity Register<sup>17</sup> and the NESO Electricity Ten Year Statement shows a clear need for the Project.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Strategic Policy S4 – Conserving and Enhancing The Natural Environment	<p>The Council is committed to the conservation and enhancement of the natural environment through the protection of designated sites and species, whilst planning positively for biodiversity networks and minimising pollution. All projects should have regard to reducing the impacts of climate change and respond to the ecological emergency, delivering multiple benefits in terms of but not exclusive to habitats, carbon storage and Natural Flood Management.</p> <p>The Council will plan for a well-connected multifunctional network of green and blue infrastructure which protects, enhances and restores ecosystems and allows nature recovery across the Council's area. The garden community developments will be required to deliver 20% Biodiversity Net Gain, other qualifying new development will be required to deliver a minimum 10% Biodiversity Net Gain. The needs and potential of biodiversity will be considered together with those of natural, historic and farming landscapes, the promotion of health and wellbeing, sustainable travel, water management including water resources, and climate change adaptation.</p> <p>The Council will ensure that new development does not contribute to water pollution and, where possible, enhances water quality, and demonstrates the advancement of biodiversity and amenity interests through the provision of a range of greenspaces. Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary. Developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters.</p> <p>The Council will ensure that, where appropriate, new development seeks to improve water-related biodiversity taking</p>	<p>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off site mitigation/enhancement. This is reported in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. In relation to water quality, <b>6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]</b> details the likely significant effects of the Project on the water environment with respect to surface water discharges and water pollution. The baseline of the water environment is characterised in this chapter. The assessment has been informed by <b>7.10 Water Framework Directive Assessment [APP-332]</b>. The assessment presents the</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>account of Water Framework Directive objectives and River Basin Management Plan actions.</p> <p>The Council will ensure that new development maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements. The Council will seek to minimise the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) to major new development.</p> <p>Contributions from qualifying residential developments within the Zones of Influence, as defined in the adopted Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS.</p>	<p>existing consented discharges to surface water that have been obtained from the Environment Agency (January 2024). During construction, temporary watercourse crossings and associated activities may lead to changes in flow regimes, hydromorphology, and pollution risks, such as runoff and drilling fluid releases. Standard practice measures outlined in <b>7.2 Outline Code of Construction Practice [REP3-025]</b> mitigate these risks, reducing impacts on water quality and hydromorphology to negligible or minor adverse levels, which are not significant. For trenchless crossings, measures like drilling fluid breakout management plans minimise disturbance to sensitive watercourses, such as the River Stour. Overall, potential impacts on designated nature conservation sites and groundwater are assessed as negligible and not significant, with safeguards ensuring minimal environmental disruption. Discussions would be held with the Environment Agency in relation to any required consents and permits necessary for the works, in accordance with commitment W01 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. Water pollution from permanent drainage will be avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality. Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with <b>6.20 Scoping Opinion [APP-297]</b>. <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b> assess the potential residual effects of the</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>Project on agricultural land use within the Order Limits. The potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. In Chelmsford, there are 29,280 hectares of BMV land, (85.5% of agricultural land in the Borough). During construction and operation (including maintenance) there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.</p> <p>The Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with residents 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 regular communication including letters, phone calls and meetings. 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. No sterilising effects on land use within</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy														
		<p>Chelmsford is anticipated as a result of the Project. Unless land has been otherwise identified for mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. No likely significant effects on agricultural operations and viability are anticipated during operation.</p>														
<p>Strategic Policy S7 – The spatial strategy</p>	<p>The Spatial Strategy applies the Spatial Principles to focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; new garden communities to the north east and east of Chelmsford; sustainable urban extensions around Chelmsford and South Woodham Ferrers; expansion of existing employment sites; and development around Key Service and Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy set out below:</p> <p>Settlement Hierarchy</p> <table border="1" data-bbox="353 906 1249 1295"> <thead> <tr> <th data-bbox="360 911 600 970">Category</th> <th colspan="2" data-bbox="607 911 1243 970">Settlement</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 975 600 1034">1. City or Town</td> <td colspan="2" data-bbox="607 975 1243 1034">Chelmsford*, South Woodham Ferrers</td> </tr> <tr> <td data-bbox="360 1038 600 1230" rowspan="2">2. Key Service Settlements</td> <td data-bbox="607 1038 958 1098">Outside Green Belt</td> <td data-bbox="965 1038 1243 1098">Within Green Belt</td> </tr> <tr> <td data-bbox="607 1102 958 1230">Bicknacre, Boreham, Broomfield, Danbury and Great Leighs</td> <td data-bbox="965 1102 1243 1230">Galleywood, Runwell, Stock and Writtle</td> </tr> <tr> <td data-bbox="360 1235 600 1294"></td> <td data-bbox="607 1235 958 1294">Outside Green Belt</td> <td data-bbox="965 1235 1243 1294">Within Green Belt</td> </tr> </tbody> </table>	Category	Settlement		1. City or Town	Chelmsford*, South Woodham Ferrers		2. Key Service Settlements	Outside Green Belt	Within Green Belt	Bicknacre, Boreham, Broomfield, Danbury and Great Leighs	Galleywood, Runwell, Stock and Writtle		Outside Green Belt	Within Green Belt	<p>The Applicant notes the locations identified for future development and growth within Chelmsford.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation. The Project does not directly interact with any residential allocations identified in the emerging Chelmsford Local Plan.</p>
Category	Settlement															
1. City or Town	Chelmsford*, South Woodham Ferrers															
2. Key Service Settlements	Outside Green Belt	Within Green Belt														
	Bicknacre, Boreham, Broomfield, Danbury and Great Leighs	Galleywood, Runwell, Stock and Writtle														
	Outside Green Belt	Within Green Belt														

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy	
3. Service Settlements	East Hanningfield, Ford End, Great Waltham, Little Waltham, Rettendon Place and Woodham Ferrers	Highwood, Margaretting, Ramsden Heath/Downham, Roxwell and West Hanningfield	
4. Small Settlements	Outside Green Belt Chatham Green, Good Easter, Howe Green, Howe Street, Little Baddow, Rettendon Common and Sandon	Within Green Belt	Edney Common

*\*Chelmsford includes its Urban Area such as Chelmer Village, Great Baddow and Springfield.*

In addition, at any of the Settlement categories, new growth sites which are in accordance with the Local Plan Spatial Principles and Strategic Policies can be allocated through relevant Neighbourhood Plans.

New development allocations will be focused on the three Growth Areas of Central and Urban Chelmsford, North Chelmsford, and South and East Chelmsford using the distribution set out in the Key Diagram (Figure 14), Policies Map, and the table below:

Spatial Strategy – Development Locations and Allocations

Local Policy Reference	Policy Wording					How the Project has had regard to Local Planning Policy
	<b>Development allocations to 2041</b>	<b>New Homes</b>	<b>Traveller Pitches</b>	<b>Travelling Show people Plots</b>	<b>Net New Employment Floorspace</b>	
<b>Growth Area 1 – Central and Urban Chelmsford</b>						
<i>Site/Location</i>						
1	Previously developed sites in Chelmsford Urban Area	3,013			4,000 sqm Use Class E(g)(i-ii)	
2	West Chelmsford	880		5		
3a	East of Chelmsford - Manor Farm	360				
3b	East of Chelmsford - Land North of Maldon Road				5,000 sqm Office/ Business Park	
3c	East of Chelmsford - Land South of Maldon Road	109				

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy		
3d	East of Chelmsford - Land North of Maldon Road	65		
4	Land North of Galleywood Reservoir	24		
5	Land surrounding Telephone Exchange, Ongar Road, Writtle	25		
<i>Area Total</i>		<i>4,476</i>	<i>5</i>	<i>9,000 sqm</i>
<b>Growth Area 2 – North Chelmsford</b>				
<b><i>Site/Location</i></b>				
6	North East Chelmsford (Chelmsford Garden Community)	5,569	10	56,946 sqm Office/Business Park
7a	Great Leighs - Land at Moulsham Hall	750	5	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy			
7b	Great Leighs 250 - Land East of London Road				
7c	Great Leighs 100 - Land North and South of Banters Lane				
8	North of Broomfield 512				
9a	Waltham Road Employment Area			3,500 sqm B2/B8	
14b	Land south of Ford End Primary School, Ford End 20				
15	Little Boyton Hall Farm Rural Employment Area			6,000 sqm B2/B8	
<i>Area Total</i>	<i>7,201</i>	<i>10</i>	<i>5</i>	<i>66,446 sqm</i>	
<b>Growth Area 3 – South and East Chelmsford</b>					

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy			
	<b>Site/Location</b>				
16a	East Chelmsford Garden Community (Hammonds Farm)	3,000	20	13	43,000 sqm Business Space
16b	Land adjacent to A12 Junction 18				43,000 sqm Business Space
10	North of South Woodham Ferrers	1,220		5	1,200 sqm Business Space
11b	Land at Kingsgate, Bicknacre	20			
11c	Land west of Barbrook Way, Bicknacre	20			
12	St Giles, Bicknacre	32			
13	Danbury	100			

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy			
17a	Land North of Abbey Fields, East Hanningfield	11			
17b	Land east of Highfields Mead, East Hanningfield	20			
<i>Area Total</i>		4,423	20	18	87,200 sqm
<b>Total Local Plan Allocations</b>		<b>16,100</b>	<b>30</b>	<b>28</b>	<b>162,646 sqm</b>
<b>Windfall Allowance 2027-2041</b>		<b>2,373</b>			
<b>TOTAL</b>		<b>18,473</b>	<b>30</b>	<b>28</b>	<b>162,646 sqm</b>

There will also be opportunities for Exception Sites providing affordable homes and community-led development in some locations where there are policies of constraint.

Windfall sites are further expected to be a reliable source of housing supply during the period of the Local Plan.

New employment growth will be delivered as part of mixed used development on appropriate previously developed sites in Chelmsford Urban Area. Strategic employment growth is directed to strategic site allocations at North East Chelmsford (Chelmsford Garden Community), a new garden community to the east of Chelmsford (Hammonds Farm), Land adjacent to A12 Junction 18, East Chelmsford, and as extensions to Little

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Boyton Hall Farm Rural Employment Area and Waltham Road Employment Area.</p> <p>All development allocations will be located to ensure existing settlements maintain their distinctive character and to avoid coalescence between them. Beyond the main settlements the Council will support diversification of the rural economy and the conservation and enhancement of the natural environment.</p> <p>New development will be delivered in a manner that ensures the timely provision of necessary supporting infrastructure. Strategic Growth Sites will be delivered in accordance with masterplans to be approved by the Council.</p> <p>Where there are large and established mainly institutional uses within the countryside, Special Policy Areas will be used to support their necessary functional and operational requirements. The Special Policy Areas are defined on the Policies Map at Chelmsford City Racecourse, Broomfield Hospital, Hanningfield Reservoir Treatment Works, RHS Hyde Hall Gardens, Sandford Mill and ARU Writtle.</p>	
Strategic Policy S8 – Delivering Economic Growth	<p>In determining planning applications, the Council will ensure that development on the flexible and market-responsive employment land allocations will enable balanced job and housing growth and allow further diversification of Chelmsford’s economy, in particular nurturing and growing the construction, clean energy, advanced manufacturing and engineering, digi-tech, life sciences, health and care, and professional and support sectors. The Council will encourage links between business and the significant education sector in Chelmsford, in particular the roles of the Anglia Ruskin University as a major economic catalyst for economic growth. The Council will seek to improve local skills and access to employment opportunities through Employment and Skills</p>	<p>The Applicant notes the locations identified for future development and growth within Chelmsford.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. The Applicant is aware of the interaction between the Project and ARU Writtle Special Policy Area.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Plans. The Council will assess development proposals against the following principles:</p> <ul style="list-style-type: none"> <li>• Priority will be given to the use of previously developed land in sustainable locations and also focusing new employment at locations well-served by active and sustainable travel modes and existing or planned public transport provision</li> <li>• Existing Employment Areas and Rural Employment Areas identified on the Policies Map will be safeguarded for employment uses, unless it can be demonstrated that there is no reasonable prospect of the allocated employment area being used for that purpose</li> <li>• Support will be given to the sustainable growth and expansion of rural businesses</li> <li>• Support will be given for regional growth sector priorities and clustering of economic activity</li> <li>• Chelmsford City Centre and sites allocated for employment are the appropriate locations for large new office (E(g)(i)) and research and development (E(g)(ii)) provision</li> <li>• New employment development will be a key component of growth within specific proposed new Strategic Growth Locations particularly the new Garden Communities in North East and East Chelmsford</li> <li>• Improving local work and training opportunities from major development proposals through Employment and Skills Plans.</li> </ul>	
Strategic Policy S9 – Infrastructure Requirements	Priorities for infrastructure provision or improvements are also contained within relevant Strategic Policies and Site Allocation policies. New development must be supported by the provision of infrastructure, services and facilities that are identified as necessary to serve its needs.	During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> contains the Travel Plan, setting out the

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p data-bbox="356 220 734 256"><b>Transport and Highways</b></p> <p data-bbox="356 264 1189 485">New development must be supported by active and sustainable means of transport to serve its need including walking, cycling and public transport modes. New highway infrastructure should help to reduce congestion, link new development and provide connections in the strategic road network. These include but are not limited to:</p> <ul data-bbox="356 496 1249 1353" style="list-style-type: none"> <li data-bbox="356 496 853 533">• New Beaulieu Park Rail Station</li> <li data-bbox="356 544 846 580">• Chelmsford North East Bypass</li> <li data-bbox="356 592 1249 699">• An additional new Northern Radial Distributor Road in North East Chelmsford Safeguarded land for the expansion of Chelmer Valley and Sandon Park and Ride sites</li> <li data-bbox="356 710 1189 817">• Additional Park and Ride facilities will be considered in West Chelmsford and North East Chelmsford within the broad locations shown on the Policies Map</li> <li data-bbox="356 828 1249 935">• Improvements to the Army and Navy Junction and routes connecting to the junction as part of a sustainable transport package</li> <li data-bbox="356 946 1249 1027">• Improvements to A131 (Essex Regiment Way) and A1016 (Essex Regiment Way)</li> <li data-bbox="356 1038 1249 1075">• New foot/cycle bridge across A131 (Essex Regiment Way)</li> <li data-bbox="356 1086 1249 1155">• Junction improvements on the A12 and other main roads to reduce congestion</li> <li data-bbox="356 1166 1249 1353">• Capacity improvements to the A132 between the Rettendon Turnpike and South Woodham Ferrers, including necessary junction improvements to be brought forward as early as possible in tandem with the delivery of development to mitigate its impact</li> </ul>	<p data-bbox="1267 220 2112 475">good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.</p> <p data-bbox="1267 486 2112 1401">In relation to flood risk, <b>6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]</b> sets out how the Project has sought to minimise impact on flooding. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. <b>7.2 Outline Code of Construction Practice [REP3-025]</b> describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority using suitable SuDS that are maintained for the Project's lifetime. <b>7.9 Flood Risk Assessment [APP-331]</b> states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>• New and improved active and sustainable travel routes and bridges both within development sites and to provide connections to centres and hubs of activity such as transport nodes, City, Town and Neighbourhood Centres, strategic areas of recreation and employment areas, education and health centres</li> <li>• A new active and sustainable route and bridge over the A12 from East Chelmsford Garden Community to connect close to Sandon Park and Ride</li> <li>• A new multi-modal vehicular bridge over the River Chelmer to connect East Chelmsford Garden Community to Junction 19 of the A12 (Boreham Interchange)</li> <li>• Bus service, bus priority schemes and rapid transit measures</li> <li>• Improvements to inter-urban public transport</li> <li>• Transport links between new neighbourhoods and Chelmsford City Centre and employment areas</li> <li>• Improved road infrastructure aimed at reducing congestion and providing more reliable journey times.</li> </ul> <p><b>Flood Risk Management</b></p> <p>New development must be safe from all types of flooding and not make flood risk worse elsewhere. Suitable strategic and site level measures will need to provide appropriate flood risk management. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Strategic flood defence measures on the Rivers Chelmer, Can and Wid to protect Chelmsford City Centre</li> <li>• Local flood mitigation measures within or as part of development sites including the use of SuDS</li> </ul>	<p>suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff.</p> <p>The Community Facilities section of Policy S9 is not relevant to the Project.</p> <p>With regard to the natural environment, the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation. This is reported in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.</p> <p><b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> reports the assessment of the likely significant cultural heritage effects that could result from the Project. The Applicant has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid,</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>Provision of new lock and replacement of weir gates at Chelmer Waterside</li> </ul> <p><b>Community Facilities</b></p> <p>Infrastructure necessary to support new development must provide a range of community infrastructure to ensure that it is served by the essential education, health and community services and facilities. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>Early years, primary and secondary, and post-16 education provision</li> <li>Essential primary, acute and community healthcare provision</li> <li>Health and wellbeing facilities and measures</li> <li>Sport, leisure and recreational facilities</li> <li>Community buildings and space</li> <li>Provision of serviced moorings along the River Chelmer</li> <li>Cultural facilities and public art</li> <li>Police, ambulance, and fire and rescue facilities</li> <li>Cemetery space and crematorium provision</li> <li>Municipal waste/recycling facilities.</li> </ul> <p><b>Green Infrastructure and Natural Environment</b></p> <p>Infrastructure necessary to support new development must provide or contribute towards ensuring a range of multifunctional green, blue, and natural infrastructure, nature recovery, net gain in biodiversity and public realm improvements. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>Provision of a wide range of open space within development sites to meet amenity, recreational and functional needs</li> </ul>	<p>reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. <b>6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]</b> concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford the Project would result in less than substantial harm to a number of designated and non-designated heritage assets, and a scheduled monument. The substantial public benefits and need for the Project, as set out in Chapter 5 of <b>5.6 Planning Statement [APP-085]</b>, including supporting the UK’s net zero target, enabling the connection of new low carbon energy.</p> <p>With regard to Utilities, any utility infrastructure required by the Project will be provided.</p>

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	<ul style="list-style-type: none"> <li>• Provision of a multifunctional network of green and blue infrastructure to enhance biodiversity</li> <li>• Provision of areas for nature recovery</li> <li>• Provision of new public realm and enhancements at key centres of activity</li> <li>• Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy</li> <li>• Contributions towards addressing cumulative recreational pressure on SSSIs.</li> </ul> <p><b>Historic Environment</b></p> <p>Infrastructure necessary to support new development must seek to preserve or enhance the historic environment and mitigate any adverse impacts on nearby heritage assets and their settings.</p> <p><b>Utilities</b></p> <p>Infrastructure necessary to support new development must include appropriate utility infrastructure. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• Utility infrastructure including electricity and gas distribution and supply, water supply, foul drainage and waste water treatment, telecommunications and gigabit broadband</li> </ul> <p>Opportunities for appropriate renewable, low and zero carbon or district-scale energy production.</p>	
Strategic Policy S10 – Securing infrastructure	Infrastructure must be provided in a timely and, where appropriate, phased manner to serve the occupants and users of the development.	In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an

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and impact mitigation	<p>Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.</p> <p>Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):</p> <ul style="list-style-type: none"> <li>• Financial contributions towards new or expanded facilities and their maintenance</li> <li>• On-site provision (which may include building works)</li> <li>• Off-site capacity improvement works, and/or</li> <li>• The provision of land.</li> </ul> <p>Infrastructure will be secured through the use of planning condition and/or planning obligation and/or financial contribution through the Community Infrastructure Levy or its successor.</p> <p>Developers and land owners must work positively with the Council, neighbouring Local Planning Authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with adopted policies and published guidance.</p> <p>In negotiating planning obligations, the Council will take into account local and strategic infrastructure needs and financial viability set out in the Local Plan Infrastructure Delivery Plan (IDP) and Local Plan Viability Assessment.</p>	<p>integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. The mitigation measures proposed within the Project will be secured through Requirements in Schedule 3 of the <b>Draft DCO [REP3-004]</b>.</p> <p>The Applicant has prepared and shared with the local authorities, Heads of Terms regarding a unilateral undertaking ('UU') to be given by National Grid to the Local Planning Authorities along the Project route under section 106 of the Town and Country Planning Act 1990 ('s.106 UU'), relating to obligations designed to secure off-site planting required as a result of the 3:1 replanting commitment. A s.106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering the off-site planting, as it allows greater flexibility to draft detailed obligations and secures strong enforcements for the benefit of the local planning authorities receiving the s.106 UU. It is not considered that a bilateral agreement or a requirement is necessary. Engagement with the local authorities on this matter is continuing.</p>

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Strategic Policy S14 - Health and Wellbeing	<p>The Council is committed to improving the health and wellbeing of our residents and communities, promoting more active and healthier lifestyles, creating healthy living environments and reducing health inequalities through high quality placemaking.</p> <p>The Council will achieve this by ensuring that new development:</p> <ul style="list-style-type: none"> <li>• Contributes towards the strategic priorities of the Chelmsford Health and Wellbeing Plan to help reduce inequalities including health</li> <li>• Has good access to services and facilities to support daily life and provide for the needs of their communities including education, employment, retail, public transport, healthcare, social, community and greenspace</li> <li>• Is well designed to create safe, inclusive and accessible places for all users and encourage social interaction and wellbeing</li> <li>• Creates opportunities for healthy and active lifestyles including access to and the provision of new multifunctional green and blue infrastructure, spaces for play, recreation and sports, and better active travel including provision for safe, attractive and well-connected pedestrian and cycle routes Provides good quality housing both externally and internally, to provide a healthy living environment now and in the future</li> <li>• Supports the provision of cultural infrastructure and public art to create a sense of place and identity</li> <li>• Is climate resilient and as sustainable and energy efficient as possible to promote healthy environments</li> </ul>	<p>The Applicant notes the content of Policy S14. Whilst the section on residential development is not relevant to the Project, the Applicant would respond as follows.</p> <p><b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> details the assessment of the potential residual effects of the Project on Health and Wellbeing. The chapter covers an assessment of construction and operational (including maintenance) effects on:</p> <ul style="list-style-type: none"> <li>• Health related environmental change (for example air quality, noise, traffic and transport related effects)</li> <li>• Mental health and wellbeing</li> <li>• The perceptions of impacts arising from Electric and Magnetic Fields (EMFs) of the Project in relation to mental health and wellbeing.</li> </ul> <p>The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. <b>6.10 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>6.17 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 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. The Applicant</p>

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	<ul style="list-style-type: none"> <li>• Provides opportunities for access to nature to support physical and mental health</li> <li>• Provides appropriate mitigation to avoid harmful health impacts/emissions.</li> </ul> <p>In addition to the above, all new strategic scale residential development (defined as development for 100 or more units) will be required to demonstrate how they have considered the following in their place making objectives:</p> <ul style="list-style-type: none"> <li>• Opportunities for community involvement in the long-term management and stewardship of the new development</li> <li>• Opportunities for growing food such as allotments, community gardens and orchards to improve access to local healthy food</li> <li>• Creation of walkable neighbourhoods to support people to live healthy lifestyles having regard to the Essex Design Guide - a New Development Model for Essex</li> <li>• Livewell Development Accreditation Scheme</li> <li>• Creation of a physical environment where people have the resilience to cope with life's changes such as a dementia friendly environment</li> <li>• Incorporation of Sport England and National Design Guide Active Design principles</li> <li>• Provision of a mix of uses on site that support daily life including education, employment, retail, public transport, healthcare, social, community and greenspace</li> <li>• Opportunities to make a significant positive contribution to health and wellbeing.</li> </ul> <p>For development of 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development in</p>	<p>recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with residents 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 regular communication including letters, phone calls and meetings. 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. In relation to Mental Wellbeing Impact Assessment (MWIA) workshops, the Applicant understands from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and anxiety associated with impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on businesses and properties) as well as perceptions of the impacts of electric and magnetic fields on health and wellbeing. <b>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b> has identified opportunities for public awareness raising about electric and magnetic fields, which will form part of measures recommended for affected communities along the proposed route.</p> <p>The mitigation hierarchy has been applied to the design of Project, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive</p>

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	<p>excess of 1,000 sqm (excluding agricultural buildings) a Health Impact Assessment will be required to assess the likely positive and negative impacts on the health and wellbeing of different groups in the population, particularly those who may be more susceptible to poorer health outcomes, and on existing health services and facilities. The assessment should include recommendations on how positive health impacts could be maximised and negative impacts on health and inequalities avoided or mitigated. The Council will require Health Impact Assessments to be prepared having regard to the most up to date advice and best practice for such assessments. Where significant impacts are identified, planning permission will be refused unless measures to meet the health service requirements of the development are mitigated.</p> <p>Developments which will have an unacceptable significant adverse impact on health and wellbeing which cannot be mitigated, or that fail to offer reasonable provisions, will be refused</p>	<p>features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies. During construction, the Project would comply with the good practice measures within <b>7.2 Outline Code of Construction Practice [REP3-025]</b> which has a number of measures that would avoid or reduce effects on health. The Project has been designed in accordance with National Grid design standards and will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024b), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project will already have designed out potential effects from EMF to a level to meet health and safety standards.</p> <p>Cumulative impacts are assessed in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. National Grid has prepared <b>7.14 Equality Impact Assessment [REP1-067]</b> to assess the Project's potential impacts on vulnerable groups and protected characteristic groups, as defined under the Equality Act 2010. The Equality Impact Assessment demonstrates whether and how National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the Public Sector Equality Duty PSED. The assessment has identified that the construction and decommissioning phases may give rise to temporary negative equality impacts, particularly in relation to:</p> <ul style="list-style-type: none"> <li>• Diversions and closures of Public Rights of Way (PRoW), which may affect older people, disabled people, and those with limited mobility;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Increased construction traffic, which may impact vulnerable road users and those accessing community facilities;</li> <li>• Noise, vibration, and air quality changes, which may differentially affect children, older people, pregnant women, and people with sensory or respiratory conditions;</li> <li>• Visual changes, which may affect neurodivergent individuals sensitive to alterations in their environment.</li> </ul> <p>These impacts are not expected to be substantial in nature and are mitigated through embedded design measures, good practice construction management, and additional mitigation where required. The project does not require the compulsory acquisition of residential properties, and no known equality impacts have been identified in relation to land acquisition.</p>
<p>Policy DM6 – New Development in the Green Belt</p>	<p>Within the Green Belt, inappropriate development will not be approved except in very special circumstances.</p> <p>A) New buildings</p> <p>Planning permission will be granted for the following exceptions to inappropriate development:</p> <ol style="list-style-type: none"> <li>buildings for agriculture and forestry;</li> <li>provision of appropriate facilities for outdoor sport, outdoor recreation and cemeteries as long as it preserves the openness of the Green Belt;</li> <li>limited infilling in villages in accordance with Policy DM9;</li> </ol>	<p>The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. The Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.</p> <p>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in <b>5.6 Planning Statement [APP-085]</b>), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of <b>5.6 Planning Statement [APP-085]</b> consider the Project’s compliance with Green Belt policy. The assessment</p>

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	<p>iv. limited affordable housing for local needs in accordance with Policy DM2;</p> <p>v. extensions or alterations to buildings in accordance with Policy DM11;</p> <p>vi. redevelopment of previously developed land in accordance with Part B of this Policy;</p> <p>vii. replacement buildings in accordance with Part C of this Policy.</p> <p>B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary building/s)</p> <p>Where the proposal would contribute to meeting an identified affordable housing need, planning permission will be granted where the proposed development does not cause substantial harm to the openness of the Green Belt.</p> <p>For all other proposals, planning permission will be granted where the proposed development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing use and/or development. The Council will assess the development based on the following:</p> <p>i the size, scale, massing and spread of the new development compared to the existing; and</p> <p>ii the visual impact of the development compared to the existing; and</p> <p>iii the activities/use of the new development compared to the existing; and</p> <p>iv the location of the site is sustainable and appropriate to the type of development proposed.</p>	<p>concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt. <b>5.6 Planning Statement [APP-085]</b> details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1 also confirms that <i>'...the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non exhaustive, list of tests:</i></p> <ul style="list-style-type: none"> <li>• <i>Where development within a Green Belt requires very special circumstances to justify development'.</i></li> </ul>

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	<p>C) Replacement buildings            Planning permission will be granted for the replacement of a building provided that:</p> <ul style="list-style-type: none"> <li>i the existing building being replaced is of permanent and substantial construction; and</li> <li>ii the new building is in the same use as the existing; and</li> <li>iii the new building is not materially larger than the one it replaces; and</li> <li>iv the new building would not be out of keeping with its context and surroundings and does not result in any other harm.</li> </ul> <p>D) Local transport infrastructure            Planning permission will be granted for local transport infrastructure which can demonstrate a requirement for a Green Belt location and would preserve the openness of the Green Belt and not conflict with its purposes.</p>	
<p>Policy DM7 - New buildings and structures in the Green Wedge</p>	<p>A) New buildings and structures            Planning permission will be granted for new buildings and structures where the development does not conflict with the purposes of the Green Wedge, and is for:</p> <ul style="list-style-type: none"> <li>i a local community facility where there is a demonstrated need; or</li> <li>ii a local community facility that supports the role and function of the Green Wedge; or</li> <li>iii agriculture and forestry or where it supports the sustainable growth and expansion of an existing, authorised and viable business where it can be demonstrated that there is a justified need; or</li> </ul>	<p>The Applicant notes this policy and would confirm that the Project will not directly interact with areas identified as the Green Wedge in the emerging Chelmsford Local Plan.</p>

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	<ul style="list-style-type: none"> <li>iv local transport infrastructure and other essential infrastructure or development which supports existing or potential utility infrastructure where the Green Wedge location is appropriate and the benefits of which override the impact on the designation; or</li> <li>v appropriate facilities or infrastructure to support active and sustainable travel; or</li> <li>vi appropriate facilities for outdoor sport, outdoor recreation and cemeteries; or</li> <li>vii a rural worker’s dwelling in accordance with Policy DM12; or</li> <li>viii infilling in accordance with Policy DM9; or</li> <li>ix limited affordable housing for local needs in accordance with Policy DM2; or</li> <li>x extensions or alterations to buildings in accordance with Policy DM11; or</li> <li>xi redevelopment of previously developed land in accordance with Part B of this Policy; or</li> <li>xii replacement buildings in accordance with Part C of this Policy; or</li> <li>xiii residential outbuildings in accordance with Part D of this Policy.</li> </ul>	
	<p>B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary building/s)</p> <p>Planning permission will only be granted where the role and function of the Green Wedge, in maintaining open land between built-up areas, protecting biodiversity and promoting recreation, would not be materially harmed, and where the development would have no greater impact on</p>	

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	<p>the character and appearance of the area than the existing use and/or development. The Council will assess the development based on the following:</p> <ul style="list-style-type: none"> <li>i the size, scale, massing and spread of the new development compared to the existing; and</li> <li>ii the visual impact of the development compared to the existing; and</li> <li>iii the impact of the activities/use of the new development compared to the existing.</li> </ul> <p>C) Replacement buildings</p> <p>Planning permission will be granted for the replacement of a building provided that:</p> <ul style="list-style-type: none"> <li>i the existing building being replaced is of permanent and substantial construction; and</li> <li>ii the new building is in the same use as the existing; and</li> <li>iii the new building would not be out of keeping with its context and surroundings, and does not result in any other harm; and</li> <li>iv the new building is not materially larger than the one it replaces.</li> </ul> <p>D) Residential outbuildings</p> <p>Planning permission will be granted for outbuildings to be used for purposes incidental to the enjoyment of the dwelling where the new outbuilding:</p> <ul style="list-style-type: none"> <li>i is located within the curtilage of the dwelling; and</li> <li>ii is ancillary in size, scale and appearance to the host dwelling; and</li> <li>iii is not self-contained independent habitable accommodation; and</li> <li>iv is well designed and in keeping with its context and surroundings and does not result in any other harm.</li> </ul>	

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Policy DM8 – New Buildings and Structures in the Rural Area	<p>A) New buildings and structures</p> <p>Planning permission will be granted for new buildings and structures in the Rural Area where the development will not adversely impact on the identified intrinsic character and beauty of the countryside and where the development is for:</p> <ul style="list-style-type: none"> <li>i a local community facility where there is a demonstrated need; or</li> <li>ii agriculture and forestry or the sustainable growth and expansion of an existing, authorised and viable business where it can be demonstrated that there is a justified need; or</li> <li>iii local transport infrastructure and other essential infrastructure or development which supports existing or potential utility infrastructure; or</li> <li>iv appropriate facilities for outdoor sport, outdoor recreation and cemeteries; or</li> <li>v a rural worker’s dwelling in accordance with Policy DM12; or</li> <li>vi housing which secures the optimal viable use of a heritage asset or enabling development to secure the future of a heritage asset; or</li> <li>vii housing which includes the re-use of redundant or disused buildings which leads to an enhancement to the immediate setting; or</li> <li>viii an isolated dwelling which is of exceptional design quality; or</li> <li>ix infilling in accordance with Policy DM9; or</li> <li>x limited affordable housing for local needs in accordance with Policy DM2; or</li> </ul>	<p>In accordance with criteria (A) the Project is an infrastructure project and is therefore a type of development considered acceptable in the rural area.</p> <p>With regard to criteria (B) within Chelmsford, the Applicant has adopted overhead line as the preferred technology choice. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>. <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232]</b> and <b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Parts 1 and 2 [APP-233 to APP-234]</b>. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully and incorporates measures to mitigate harm to landscape and visual receptors, having regard to</p>

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	<ul style="list-style-type: none"> <li>xi extensions or alterations to buildings in accordance with Policy DM11; or xii redevelopment of previously developed land in accordance with Part B of this Policy; or</li> <li>xiii replacement buildings in accordance with Part C of this Policy; or</li> <li>xiv residential outbuildings in accordance with Part D of this Policy.</li> </ul>	<p>National Grid’s statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), ‘these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure’.</p>
B)	<p>Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary buildings)</p> <p>Planning permission will be granted where the proposed development would not result in harm to the identified intrinsic character, appearance and beauty of the area. The Council will assess the development based on the following:</p> <ul style="list-style-type: none"> <li>i the size, scale, massing and spread of the new development compared to the existing; and</li> <li>ii the visual impact of the development compared to the existing; and</li> <li>iii the impact of the activities/use of the new development compared to the existing; and</li> <li>iv the location of the site is appropriate to the type of development proposed.</li> </ul>	
C)	<p>Replacement buildings</p> <p>Planning permission will be granted for the replacement of a building provided that:</p> <ul style="list-style-type: none"> <li>i the existing building being replaced is of permanent and substantial construction; and</li> <li>ii the new building is in the same use as the existing; and</li> </ul>	

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	<ul style="list-style-type: none"> <li>iii the new building would not be out of keeping with its context and surroundings and does not result in any other harm.</li> </ul> <p>D) Residential outbuildings</p> <p>Planning permission will be granted for outbuildings to be used for purposes incidental to the enjoyment of the dwelling where the new outbuilding:</p> <ul style="list-style-type: none"> <li>i is located within the curtilage of the dwelling; and</li> <li>ii is ancillary in size, scale, and appearance to the host dwelling; and</li> <li>iii is not self-contained independent habitable accommodation; and</li> <li>iv is well designed and in keeping with its context and surroundings, and does not result in any other harm.</li> </ul>	
<p>Policy DM10 - Change of use (Land and buildings) and Engineering operations</p>	<p>A) Green Belt</p> <p>Planning permission will be granted for the change of use of buildings in the Green Belt where:</p> <ul style="list-style-type: none"> <li>i the building is of permanent and substantial construction, and works to convert the building would not result in substantial reconstruction; and</li> <li>ii the building is in keeping with its surroundings, and any alterations or extensions are proportionate in size in relation to the existing building and do not harm its original character; and</li> <li>iii the use of land within the curtilage of the building, and which is to be used in association with that building, would not result in harm to the openness of the Green Belt; and</li> </ul>	<p>The Applicant notes this Policy and would confirm that the Project is not proposing to change the use of any buildings in the Green Belt, Green Wedge or rural area.</p> <p>The Applicant notes that the policy states that engineering operations will be permitted within the Rural Area where they do not adversely impact upon the identified intrinsic character, appearance and beauty of the Rural Area. As stated by the Applicant in their Green Belt position the Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>iv where the building was constructed less than ten years ago for the purposes of agriculture, but it can be demonstrated that it is no longer required for agriculture.</p> <p>In addition to criteria i to iv above, where the proposed use is for a dwelling or dwellings, the building must have been constructed more than ten years ago.</p> <p>Engineering operations and material changes in the use of land will be permitted within the Green Belt where they preserve openness, do not conflict with the purposes of including land in the Green Belt, and do not harm the character and appearance of the area.</p> <p>B) Green Wedge</p> <p>Planning permission will be granted for the change of use of buildings in the Green Wedge where:</p> <p>i the building is of permanent and substantial construction, and works to convert the building would not result in substantial reconstruction; and</p> <p>ii the building is in keeping with its surroundings, and any alterations or extensions are proportionate in size in relation to the existing building and do not harm its original character; and</p> <p>iii the use of any land within the curtilage of the building, and which is to be used in association with that building, would not conflict with the purposes of the Green Wedge designation; and</p> <p>iv the building was constructed less than ten years ago for the purposes of agriculture, but it can be demonstrated that it is no longer required for agriculture.</p> <p>In addition to criteria i to iv above, where the proposed use is for a dwelling or dwellings, the building must have been</p>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>constructed more than ten years ago. Changes of use of land and engineering operations, including proposals which enhance the role of the Green Wedge as an active travel corridor, will be permitted where the development would not adversely impact on the role, function, character and appearance of the Green Wedge as set out in Strategic Policy S11.</p> <p>C) Rural Area</p> <p>Planning permission will be granted for the change of use of land or buildings in the Rural Area where:</p> <ul style="list-style-type: none"> <li>i the building is of permanent and substantial construction, and works to convert the building would not result in substantial reconstruction; and</li> <li>ii the building is in keeping with its surroundings, and any alterations or extensions do not harm its original character; and</li> <li>iii it does not adversely impact on the identified intrinsic character, appearance and beauty of the Rural Area; and</li> <li>iv the building was constructed less than ten years ago for the purposes of agriculture, but it can be demonstrated that it is no longer required for agriculture.</li> </ul> <p>In addition to criteria i to iv above, where the proposed use is for a dwelling or dwellings, the building must have been constructed more than ten years ago.</p> <p>Engineering operations will be permitted within the Rural Area where they do not adversely impact upon the identified intrinsic character, appearance and beauty of the Rural Area.</p>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM14 – Non-Designated Heritage Assets	<p>Proposals will be permitted where they retain the significance of a non-designated heritage asset, including its setting. Where proposals would lead to harm to the significance of a non-designated heritage asset or its loss, proposals should demonstrate that:</p> <ul style="list-style-type: none"> <li>i the level of harm or loss is justified following a balanced judgement of harm and the significance of the asset; and</li> <li>ii harm is minimised through retention of features of significance and/or good design and/or mitigation measures.</li> </ul>	<p><b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.</p> <p>With regard to non-designated heritage assets, <b>6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]</b> and <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> conclude that within Chelmsford City Council (Section F) the Project would result in permanent adverse magnitude of impact to three non-designated heritage assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm.</p> <p>The substantial public benefits and need for the Project, as set out in Chapter 5 of <b>5.6 Planning Statement [APP-085]</b>, including supporting the UK’s net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to non-designated heritage assets of scheduled quality.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM18 – Flooding/Suds	<p>A) Planning permission for all types of development will only be granted where:</p> <ul style="list-style-type: none"> <li>i it can be demonstrated that the site is safe from all types of flooding, either because of existing site conditions or through flood risk management from the development, now and for the lifetime of the development; and</li> <li>ii it does not worsen flood risk elsewhere.</li> </ul> <p>B) In addition to above Part A) development within areas of flood risk will be required to:</p> <ul style="list-style-type: none"> <li>i provide a safe dry refuge and a safe means of escape or suitably manage risk through some other means; and</li> <li>ii manage surface water run-off so that the discharge rate will not exceed the equivalent 1 in 1 greenfield rate, unless there are overriding reasons for not doing so; and</li> <li>iii locate the most vulnerable development in areas of lowest flood risk unless there are overriding reasons for not doing so; and</li> <li>iv provide wider sustainability benefits to the community that mitigate flood risk.</li> </ul> <p>C) All major development will be required to incorporate integrated water management measures such as rainwater/stormwater harvesting to reduce surface water run-off and ensure that it does not increase flood risk elsewhere. The principal method to do so should be the use of Sustainable Drainage Systems (SuDS). As well as providing appropriate water management measures, where possible SuDS should be multifunctional to deliver amenity, recreational and biodiversity benefit for the built, natural (including green infrastructure) and historic environment.</p>	<p><b>7.9 Flood Risk Assessment [APP-331]</b> has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the Project located in the Chelmsford City Council area (Section F of the Project route) are mostly located in Flood Zone 1. As addressed in <b>7.9 Flood Risk Assessment [APP-331]</b> there are two pylons proposed in the floodplain in Section F that would need compensatory storage. The Risk of Flooding from Surface Water map (see <b>6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]</b>) shows that most of the land within Section F is at very low risk of surface water flooding. As shown in <b>7.9 Flood Risk Assessment [APP-331]</b>, where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. However, there are small parts of the temporary construction compound off Braintree Road, near TB134, Chelmsford (TB Main) shown to be at high risk of surface water flooding. The requirements for compensation of loss of floodplain storage associated with these pylons is secured by commitment W17 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would</p>

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	<p>D) Surface water connections should follow the sustainable drainage hierarchy with connection to the public sewerage network only made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users. Surface water connections to the foul sewer will not be permitted, and only to a combined sewer in exceptional circumstances.</p>	<p>be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid's technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. <b>7.2 Outline Code of Construction Practice [REP3-025]</b> describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority using suitable SuDS that are maintained for the Project's lifetime. <b>7.9 Flood Risk Assessment [APP-331]</b> states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff.</p>
<p>Policy DM19 – Renewable and low carbon energy</p>	<p>Planning permission will be granted for renewable or low carbon energy developments provided that they:</p> <ul style="list-style-type: none"> <li>i do not cause demonstrable harm to residential living environment; and</li> <li>ii avoid or minimise impacts on the historic environment; and</li> <li>iii can demonstrate no adverse effect on the natural environment including designated sites; and</li> <li>iv do not have an unacceptable visual impact which would be harmful to the character of the area; and</li> </ul>	<p>The Applicant notes this policy in support of renewable and low carbon energy. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a Critical National Priority (CNP) for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. The Project includes works within the Metropolitan Green Belt. The works within Chelmsford comprise of standard</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>v will not have a detrimental impact on highway safety.</p> <p>Where located within the Green Belt, renewable or low carbon energy developments will also need to demonstrate very special circumstances in order to be approved.</p> <p>For major renewable and low carbon energy proposals, a package of community benefits should be delivered to ensure a positive community legacy.</p>	<p>height pylons (and low height pylons at Great Waltham, outside of the Green Belt). As outlined in Chapter 7 of <b>5.6 Planning Statement [APP-085]</b>, National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in <b>5.6 Planning Statement [APP-085]</b>), it is nevertheless considered that there are very special circumstances which justify their acceptability. The Applicant notes Chelmsford's position set out in <b>[REP2-035]</b> that the very special circumstances identified do not justify the harm caused by the development on the openness of the Green Belt.</p> <p>Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will commence the decision-making process with the presumption that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies, including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM27 - Parking standards	<p>The Council will have regard to the vehicle parking standards set out in the 2024 Essex Parking Guidance when determining planning applications.</p> <p>Proposals which provide below these standards should be supported by evidence detailing the local circumstances that justify deviation from the standard.</p>	<p>carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development. In this context, the precedent established by national policy takes precedence over local policy, as the reinforcement and improvement of electrical national infrastructure is deemed a matter of paramount importance at the national level.</p> <p>The Applicant would note that there are no relevant standards for the Project. Construction workers and vehicles will have sufficient parking provision within the designated temporary construction compounds. As a result, there would be no additional demand for parking spaces along the Local Road Network. No additional mitigation is required and there would be no significant effects.</p> <p>Effects on parking and loading have been analysed on those road links forming the Primary Access Routes where any formal or informal parking suspension has been identified. The assessment of parking and loading effects arising through the construction phase is presented in Table A, 16.4.7: Significance of Effect Parking and Loading in <b>6.16.A4 Appendix 16.4: Traffic and Transport Construction Effects [APP-275]</b>.</p>

## 2.10 Brentwood Borough Council

- 2.10.1 Brentwood Borough Council did not respond to Question GEN 1.3 in their response to the Examining Authority’s Written Questions 1 [REP3-096].
- 2.10.2 In reviewing the Brentwood Borough Council **Local Impact Report [REP-150]** it was noted that there were policies which had not been included in the assessment presented in **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**. For completeness these policies are set out below

Table 2.5 Signposting of policy wording of any relevant adopted or emerging local plan policy (Brentwood Borough Council)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Brentwood Local Plan (2016-2033)</b>		
Strategic Policy MG01: Spatial Strategy	<p>Quantum of Development</p> <p>1. The Council will work positively and proactively with development industry and wider stakeholders to enable the development of the allocated sites identified on the Policies Map in order to meet the borough’s housing and employment needs and targets. To facilitate a significant increase in the delivery of new homes as well as jobs to promote sustainable communities, provision is made for:</p> <ul style="list-style-type: none"> <li>a. 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 300 dwellings per year to 2023/24, followed by 400 dwellings per year to 2029/30 and then 984 dwellings per year to 2032/33;</li> <li>b. 13 permanent pitches to accommodate Gypsy and Traveller accommodation needs, distributed across the borough as set out in Policy HP07;</li> <li>c. about 46.64 ha of new employment land, 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of convenience floorspace, to enable the creation of at least 5,000 additional jobs.</li> </ul>	<p>The Applicant notes the locations identified for future development and growth within Brentwood.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation including Dunton Hills Garden Village (DHGV). The 2023 preferred draft alignment was amended to take forward a preference to follow the gas pipeline corridor (that runs along the eastern boundary of DHGV) for a greater distance, such that the overhead line would not introduce a new constraint in this location, having regard to DHGV.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Growth Distribution</p> <p>2. The majority of new development is directed to the borough's two strategic transit growth corridors, as illustrated in the Key Diagram, ensuring the benefits resulting from their proximity to existing sustainable transport infrastructure. This strategy has required the release of land from the green belt. The geographic distribution and pattern of growth is planned as follows:</p> <ul style="list-style-type: none"> <li>a) Central Brentwood Growth Corridor comprising mainly brownfield infill and urban extensions. Three strategic residential-led, mixed-use sites in this location are allocated;</li> <li>b) South Brentwood Growth Corridor comprising largely of employment provision, brownfield redevelopment and a new Garden Village settlement.</li> </ul> <p>Two strategic residential-led, mixed-use development sites in this location are allocated;</p> <ul style="list-style-type: none"> <li>c) Limited growth is planned at suitable sites in two northern villages of Kelvedon Hatch and Blackmore;</li> <li>d) The housing requirements for designated neighbourhood plan areas in the borough are outlined in the table of Figure 4.2.</li> </ul>	<p>The development of the Project from consideration of strategic options through to detailed siting of individual elements has been comprehensively set out in documents published in support of consultation and the development consent application. In relation to Dunton Hills Garden Village, this includes <b>5.1 Consultation Report [APP-066]</b> paragraphs 3.2.4 and 3.3.3, Tables 6.7, 9-8, 10-46 and 10.50; <b>5.15 Design Development Report [APP-122]</b> section 10.4; <b>7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]</b> section 7.5; <b>7.19 2023 - Strategic Options Backcheck and Review [APP-357]</b> section 12; <b>7.20 2023 - Design Development Report for the Project [APP-358]</b> paragraphs 3.2.12, 5.5.142 to 5.5.145, 6.3.1 and 6.4.145 to 6.4.148; and <b>7.21 2024 - Design Development Report for the Project [APP-359]</b> paragraphs 5.3.21, 5.4.8 and 5.4.211 to 5.4.214. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with NPS EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules.</p> <p>The consideration of the guidance in the Holford and Horlock Rules has been consistently applied with due regard to other factors and respecting the flexibility inherently allowed for within the Rules. The guidance provided by the Rules has been applied throughout Project development. In <b>7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]</b> published in 2022, and the Design Development Reports (DDRs) published as part of the 2023 non-statutory consultation (<b>7.20 2023 Design Development Report for the Project [APP-358]</b>, 2024 statutory consultation (<b>7.21 2024 - Design Development Report for the Project [APP-359]</b>) and with the application for development consent (<b>5.15 Design</b></p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Strategic Policy BE01: Carbon Reduction and Renewable Energy	<p>1. Carbon Reduction and Construction Standards</p> <p>Development should meet the minimum standards of sustainable construction and carbon reduction as set out below:</p> <p>a) All major development will be required to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations; and</p> <p>b) New Non-residential development will be required to achieve a certified ‘Excellent’ rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards.</p> <p>The version of BREEAM that a building must be assessed under should be the latest BREEAM scheme and not be based on scheme versions that have been registered under at the pre-planning stages of a project. Other construction standards, such as LEEDs or Passivhaus, will be supported provided that they are broadly at least in line with the standards set out above.</p> <p>2. Renewable Energy</p> <p>Wherever possible, application of major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy. Where on-site provision of renewable technologies is not appropriate, or where it is clearly demonstrated that the</p>	<p><b>Development Report for the Project [APP-122]</b>, all set out how the Holford and Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback.</p> <p>Offshore wind energy has an important role to play in delivering this strategy, and a significant step change is required to deliver up to 50 GW of offshore wind energy by 2030, given the current capacity is around 13 GW. Energy networks will be a critical enabler for the clean energy transition; however, the scale and pace of investment needed to meet the UK’s decarbonisation targets are significant. National Grid sits at the heart of Britain’s energy system, connecting millions of people and businesses to the energy they use every day. Overall, National Grid will be investing around £15bn in the UK over five years to upgrade our networks and support the UK’s net zero ambition. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations. National Grid’s infrastructure Projects across England and Wales are helping to connect more renewable energy to homes and businesses. The growth in offshore wind, nuclear generation, and interconnector capacities in East Anglia greatly increase the power transfer requirements out of the region as local total generation will exceed local demand. The existing high voltage electricity network in East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected while meeting the Security and Quality of Supply Standard (SQSS). Several network reinforcements Projects are planned to address the shortfall of which the Project is one. The need for the Project is summarised in Chapter 3 of <b>5.6 Planning</b></p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>above target cannot be fully achieved on-site, any shortfall should be provided through:</p> <ul style="list-style-type: none"> <li>a) 'allowable solutions contributions' via Section 106 or CIL. These funds will then be used for energy efficiency and energy generation initiatives or other measure(s) required to offset the environmental impact of the development; or</li> <li>b) off-site provision, provided that an alternative proposal is identified, and the measures can be secured.</li> </ul> <p>3. Application of major development, including proposals involving the redevelopment of existing floor space, should be accompanied by a Sustainability Statement outlining their approach to the following issues:</p> <ul style="list-style-type: none"> <li>a) adaptation to climate change;</li> <li>b) carbon reduction;</li> <li>c) water management;</li> <li>d) site waste management;</li> <li>e) use of materials;</li> </ul> <p>4. Where it is not possible to meet these standards, applicants must demonstrate compelling reasons and provide evidence, as to why achieving the sustainability standards would not be technically feasible or economically viable.</p>	<p><b>Statement [APP-085] and 7.17 Strategic Options Backcheck and Review Report [APP-355].</b> Increased transmission capability is required in the East Anglia region, to allow National Grid to maintain a robust network, remain in accordance with its licence obligations, and to allow new sources of electricity generation to connect. This is vital to facilitate the ambitious targets set by the Government, for secure, clean and affordable energy for the long term. The NESO's Clean Power 2030 report (NESO, 2024) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn up) in locations closer to electricity users.</p> <p><b>6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]</b> has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG)</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>emissions because of material use and construction activities.</p> <p><b>7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308]</b> includes a decarbonisation tracker; the use stage is covered as part of the tracker (i.e. the operational stage). The owners and key actions would be identified for each opportunity to reduce greenhouse gas emissions throughout the Project life cycle. This enables specific responsibilities to be assigned within the Project's organisational structure. National Grid's overarching decarbonisation commitment is to achieve net zero greenhouse gas emissions by 2050. This net zero target covers Scope 1 (direct emissions, e.g. fuel consumption on-site), Scope 2 (indirect emissions, e.g. purchased electricity) and Scope 3 (indirect emissions from upstream and downstream, e.g. emissions associated with purchased goods). At a corporate level therefore greenhouse gas emissions are tracked as the asset will become part of the wider energy infrastructure. Opportunities to reduce emissions will also be identified as part of these decarbonisation commitments.</p> <p><b>7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016]</b> commits the Main Works Contractor(s) to designing out waste wherever possible to reduce what needs to be taken off-site. In addition, <b>7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016]</b> ensures that any company collecting waste from the Project is legally authorised to do so and that it is disposed via a registered carrier to a licensed landfill site, a licensed transfer station, a licensed recycling facility or an exempt site. Cumulative carbon emissions and costs associated with waste would be considered by the Main Works Contractor(s) during construction.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Strategic Policy BE08: Strategic Transport Infrastructure	<p>In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including:</p> <ul style="list-style-type: none"> <li>a) circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations;</li> <li>b) circulation arrangement and public realm around West Horndon station, and the creation of associated multimodal interchange through phases to support new residents and employees;</li> <li>c) improvements to the highway network as deemed necessary by transport evidence or as agreed by National Highways and Essex County Council as appropriate, other statutory bodies, stakeholders and passenger transport providers; and</li> <li>d) additional and/or improved pedestrian, cycling infrastructure and bus services connecting development to key destinations such as railway stations, education facilities, employment, retail and leisure.</li> </ul>	<p>Traffic and transport mitigation proposed within <b>7.11 Transport Assessment [APP-333]</b> and <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> is captured within <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>. It is the intention that a final Construction Traffic Management Plan be agreed prior to each stage of authorised development. <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> and <b>7.6 Outline Public Rights of Way Management Plan [APP-329]</b> are secured through Requirement 4(1) of Schedule 3 of <b>3.1 Draft Development Consent Order [REP3-004]</b>.</p>
Strategic Policy BE09: Sustainable Means of Travel and Walkable Streets	<ol style="list-style-type: none"> <li>1. Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.</li> <li>2. Development proposals should provide the following sustainable measures as appropriate:</li> </ol>	<p>It is considered that the wording of this policy is of relevance primarily to the construction phase. During the operation and maintenance stages of the Project, vehicle movements will be minimal. Section 7.6 of <b>7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>a) the provision of pedestrian, cycle, public transport and where appropriate, bridleway connections within development sites and to the wider area, including key destinations;</li> <li>b) the creation of safe, secure, well connected and attractive layouts which minimise the conflicts between traffic, cyclists and pedestrians, and allow good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve areas where passenger transport, pedestrian or cycle movement is difficult or dangerous;</li> <li>c) the provision of community transport measures promoting car pools, car sharing, voluntary community buses, cycle schemes;</li> <li>d) safeguarding existing and proposed routes for walking, cycling, and public transport, from development that would prejudice their continued use and/or development; and</li> <li>e) any development requiring a new road or road access, walking and cycling facilities and public transport, will be required to have regard to the adopted Essex County Council’s Development Management Policies or successor documents, in order to assess the impact of development in terms of highway safety and capacity for both access to the proposed development and the wider highway network.</li> </ul>	<p>The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met.</p> <p>The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non compliance and would follow the non-Compliance procedure in Section 6.3 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>.</p> <p>The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contractor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy MG04: Health Impact Assessments (HIA's)	<p>A. To ensure new development is designed to promote good health, a Health Impact Assessment, will be required for residential proposals of 50 or more units (or less than 50 units at the discretion of the planning authority where the number of units could propose a significant impact on the community and infrastructure) and non-residential developments of 1,000m<sup>2</sup>, or more, and hot food takeaways that are not within a designated town, district or local centre and are within 400 metres of a school entrance. The Health Impact Assessment will be prepared in accordance with the advice and best practice as published by Public Health England and locally through the EPOA HIA Guidance Note, using the most up to date guidance. The purpose of the Health Impact Assessment is to identify opportunities of positive health impacts and potential negative impacts and how they might be mitigated.</p> <p>B. Where significant impacts are identified, planning permission will be refused unless reasonable mitigation or planning controls can be secured</p>	<p><b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in <b>6.19 Scoping Report [APP-288 to APP-296]</b> and agreed within <b>6.20 Scoping Opinion [APP-297]</b>, the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the Environmental Statement. Air Quality Management Areas and Air Quality Action Plans prepared by the local planning authority have been taken</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy BE03: Establishing Low Carbon and Renewable Energy Infrastructure Network	<p>Renewable energy infrastructure</p> <ol style="list-style-type: none"> <li>1. Innovative approaches to the installation and/or construction of energy generation facilities or low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.</li> </ol> <p>Decentralised energy infrastructure</p> <ol style="list-style-type: none"> <li>2. New development proposals of over 500 dwelling units, including brownfield and urban extensions, or where the clustering of new sites totals more than 500 units, should include energy masterplans to incorporate decentralised energy infrastructure in line with the following hierarchy: <ol style="list-style-type: none"> <li>i. where there is an existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to connect to it;</li> </ol> </li> </ol>	<p>into consideration as a part of the Environmental Statement assessment. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. A cumulative assessment is provided in <b>6.17 Environmental Statement 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 significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.</p>
		<p>This policy is not directly of relevance to the Project. However, Paragraph 3.3.62 of NPS EN-1 confirms the Government’s recognition of a Critical National Priority (CNP) for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>ii. where there is no existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to deliver an onsite heat network, unless it can be demonstrated to the Council's satisfaction that this would render the development unviable;</li> <li>iii. where a developer is unable to deliver a decentralised heat network, it will need to be demonstrated to the satisfaction of the Council that the applicant has fully assessed all reasonably available options for its incorporation and delivery and has designed the development to allow future connection to a heat network unless it can be demonstrated that a lower carbon alternative has been put in place</li> </ul> <p>3. New development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:</p> <ul style="list-style-type: none"> <li>i. connection to existing CHP/CCHP distribution network;</li> <li>ii. site-wide renewable CHP/CCHP;</li> <li>iii. site-wide gas-fired CHP/CCHP;</li> <li>iv. site-wide renewable community heating/cooling;</li> <li>v. site-wide gas-fired community heating/cooling;</li> <li>vi. individual building renewable heating.</li> </ul>	
Policy BE12: Mitigating the Transport	1. Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion.	It is considered that the wording of this policy is of relevance primarily to the construction phase of the Project. Section 7.6 of <b>7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction</b>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Impacts of Development	<p>2. New development proposals will be required to be supported by:</p> <ul style="list-style-type: none"> <li>a) Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council’s Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements;</li> <li>b) where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to: <ul style="list-style-type: none"> <li>i. mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B; and</li> <li>ii. accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone,</li> </ul> </li> </ul>	<p><b>Worker Travel Plan [APP-311]</b> sets the initiatives that will be implemented by the TPC to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met.</p> <p>The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non compliance and would follow the non-Compliance procedure in Section 6.3 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>.</p> <p>The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contractor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy BE15: Planning for Inclusive Communities	<p>1. Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places. Proposals should:</p> <ol style="list-style-type: none"> <li>provide a comprehensive design approach that delivers a high quality, safe, attractive, inclusive, durable and healthy places in which to live and work;</li> <li>make efficient use of land and infrastructure;</li> <li>deliver sustainable buildings, places and spaces that can adapt to changing social technological, economic, environmental and climate conditions;</li> <li>create permeable, accessible and multifunctional streets and places that promotes active lifestyles;</li> <li>respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets);</li> <li>integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage;</li> <li>where applicable, ensure that new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in developments;</li> <li>employ the use of high-quality street furniture, boundary treatments, lighting, signage, high quality materials and finishes to help create a durable development with local distinctiveness;</li> </ol>	<p>Good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. NPS EN-1 and NPS EN-5 (both 2024) set out the requirement to deliver good design, and in developing the Project the Applicant has responded to the criteria by which it will be assessed, using the guidance of the Holford Rules and the Horlock Rules. <b>7.15 Design and Access Statement [REP2-020]</b> sets out how the Project reflected the four principles of good design in the Planning Inspectorate’s ‘Advice on good design’. The majority of the Applicant’s infrastructure for the Project is located above ground. The key design objective was to ensure that this infrastructure was integrated successfully into its surroundings having regard to National Grid's statutory duties under the following:</p> <ul style="list-style-type: none"> <li>Electricity Act 1989: Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission Section 38 and Schedule 9 duties to preserve natural beauty and mitigate environmental effects</li> <li>Industry-standard Holford Rules for overhead line routeing and Horlock Rules for substation siting</li> </ul>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>i) avoid unacceptable overlooking or loss of privacy;</li> <li>j) safeguard the living conditions of future occupants of the development and adjacent residents;</li> <li>k) sensitively integrate parking places and functional needs for storage, refuse and recycling collection points;</li> <li>l) mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and residential areas.</li> </ul> <p>2. Proposals for major development should be supported by an area specific masterplan. Where appropriate, the Council will consider the use of a complementary design guide/code, to help guide the necessary design coherence across the entire development site. Design proposals will be expected to:</p> <ul style="list-style-type: none"> <li>a) demonstrate early, proactive, inclusive and effective engagement with the community and other relevant partners;</li> <li>b) have regard to Supplementary Planning Documents and Guidance published by the Council, Essex County Council and other relevant bodies;</li> <li>c) address feedback from the Council through its Pre-application Advice Service and where appropriate, feedback from an independent Design Review Panel.</li> </ul> <p>3. Development proposals should be supported by a statement setting out the sustainable long-term governance and stewardship arrangements for the maintenance of supporting infrastructure including community assets, and open spaces; the statement should be proportionate to the scale of the scheme and quantum of infrastructure being delivered.</p>	<ul style="list-style-type: none"> <li>• The then-current policy framework (including the 2011 National Policy Statements EN-1 and EN-5) which was the relevant policy framework during the design stage of the Project</li> <li>• NPS EN-1 (2024) and NPS EN-5 (2024) which are the policies relevant to the Project.</li> </ul> <p>In <b>7.15 Design and Access Statement [REP2-020]</b>, the Applicant has now fulfilled the requirement to appoint a Design Champion role. Given the current stage of the Project, this will consist of two complementary roles:</p> <ul style="list-style-type: none"> <li>• Development Design Champion (DDC), formally appointed from the existing Project Design Team</li> <li>• Delivery and Detail Design Champion (DDDC) from the Great Grid Partnership, who will be responsible for detailed design during the delivery phase.</li> </ul> <p>Together, the DDC and DDDC will ensure design leadership and continuity across the full Project lifecycle. The appointment of a Design Champion is supported by NPS EN-1, National Infrastructure Commission Design Principles and the Planning Inspectorate Advice on Good Design.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy R01(ii): Spatial Design of Dunton Hills Garden Village	<p>Master Planning, Design and Layout</p> <ol style="list-style-type: none"> <li>1. All development proposals in relation to the site shall be in accordance with an approved masterplan. The masterplan shall relate to the whole of the allocated site and be produced in consultation with local communities and all relevant stakeholders and shall include a statement that sets out how community and stakeholder involvement has influenced the design and layout of the submitted scheme and its intended delivery. The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission.</li> <li>2. The Masterplan shall: <ol style="list-style-type: none"> <li>a) be locally led with the community and relevant stakeholders, in accordance with the Statement of Community Involvement;</li> <li>b) show the intended overall design and layout of the development and the proposed distribution and location of uses across the allocated site which shall accord with, be based upon and promote, garden community principles;</li> <li>c) demonstrate how heritage assets and their settings will be sympathetically and appropriately integrated into the development taking into account the requirements of para.3 (j) and (k) below;</li> <li>d) identify the proposed transport links, including access to the site and main internal highway links, and principal walking, cycling and bridle links (including links to the surrounding network);</li> </ol> </li> </ol>	<p>The Applicant notes the locations identified for future development and growth within Brentwood.</p> <p>The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation including Dunton Hills Garden Village (DHGV). The 2023 preferred draft alignment was amended to take forward a preference to follow the gas pipeline corridor (that runs along the eastern boundary of DHGV) for a greater distance, such that the overhead line would not introduce a new constraint in this location, having regard to DHGV.</p> <p>The development of the Project from consideration of strategic options through to detailed siting of individual elements has been comprehensively set out in documents published in support of consultation and the development consent application. In relation to Dunton Hills Garden Village, this includes <b>5.1 Consultation Report [APP-066]</b> paragraphs 3.2.4 and 3.3.3, Tables 6.7, 9-8, 10-46 and 10.50; <b>5.15 Design Development Report [APP-122]</b> section 10.4; <b>7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]</b> section 7.5, <b>7.19 2023 - Strategic Options Backcheck and Review [APP-357]</b> section 12, <b>7.20 2023 - Design Development Report for the Project [APP-358]</b> paragraphs 3.2.12, 5.5.142 to 5.5.145, 6.3.1 and 6.4.145 to 6.4.148; and <b>7.21 2024 -</b></p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>e) show all structural landscaping and the treatments to be provided (including boundary treatments and measures to ensure visual separation from Basildon);</li> <li>f) incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments;</li> <li>g) show all intended links to the surrounding footpath and cycleway network and indicate potential footpath and cycleway links towards Basildon from the east of the allocated site;</li> <li>h) show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;</li> <li>i) provide for convenient pedestrian and cycle links through the allocated site towards West Horndon Station;</li> <li>j) show how the development will incorporate the full range of sustainable transport measures, including dedicated bus services and the location and nature of a mobility hub;</li> <li>k) identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them; and</li> <li>l) include a phasing and implementation plan which should secure the phasing of development across the whole of the allocated site to ensure that the development will be carried out in a manner that co-ordinates the implementation and timely delivery of such on and off-site infrastructure as shall be necessary to</li> </ul>	<p><b>Design Development Report for the Project [APP-359]</b> paragraphs 5.3.21, 5.4.8 and 5.4.211 to 5.4.214. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with NPS EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules.</p> <p>The consideration of the guidance in the Holford and Horlock Rules has been consistently applied with due regard to other factors and respecting the flexibility inherently allowed for within the Rules. The guidance provided by the Rules has been applied throughout Project development. In <b>7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]</b> published in 2022, and the Design Development Reports (DDRs) published as part of the 2023 non-statutory consultation (<b>7.20 2023 Design Development Report for the Project [APP-358]</b>, 2024 statutory consultation (<b>7.21 2024 - Design Development Report for the Project [APP-359]</b>) and with the application for development consent (<b>5.15 Design Development Report for the Project [APP-122]</b>), all set out how the Holford and Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>support each phase of the development and to ensure that:</p> <ul style="list-style-type: none"> <li>i. its impacts are satisfactorily and appropriately mitigated;</li> <li>ii. there are adequate supporting facilities (including access to adequate green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community; and</li> <li>iii. occupiers have an appropriate range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian link to West Horndon Station.</li> </ul> <p>3. Development proposals should:</p> <ul style="list-style-type: none"> <li>a) ensure that detailed design and layout take into account the guidance contained in an adopted Garden Village Design Supplementary Planning Document;</li> <li>b) ensure that the distinct spatial, landscape and heritage qualities of the site and its surroundings are maintained or enhanced;</li> <li>c) ensure that the design of neighbourhoods is such that they are harmoniously integrated to form an overall Dunton Hills Garden Village identity and distinctiveness;</li> <li>d) combine to provide an appropriate range of densities across the site to ensure a compact and highly networked, walkable and fine-grained environment with a highly connected street-based layout that encourages walking and cycling;</li> </ul>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<ul style="list-style-type: none"> <li>e) provide, or relate appropriately to, well-located multi-functional green infrastructure to promote safe, and attractive environments for leisure, informal and adventure play areas, recreational and sporting activity with appropriate levels of surveillance;</li> <li>f) promote coherent signposted internal footpath and cycleway routes that provide, where appropriate, links to the surrounding network with sympathetic transitions between the rural and urban environment;</li> <li>g) provide or contribute to a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features and, wherever possible and appropriate, the enhancement of existing, or the creation of new, habitats; and</li> <li>h) provide an appropriate level of formal sports pitches and facilities to meet the evolving needs of the community;</li> <li>i) ensure the public right of way (PRoW) network is retained, maintained and enhanced;</li> <li>j) take into account the findings of the Council’s Heritage Impact</li> </ul>	
	<p>Assessment for Dunton Hills Garden Village and the applicant’s own heritage impact assessment and demonstrate what measures have been taken to sustain the significance of any affected designated and nondesignated heritage asset and its setting, whether on or off-site and, wherever possible and appropriate, include other measures to provide enhancements to their settings; and</p>	
	<ul style="list-style-type: none"> <li>k) take into account the results of a programme of archaeological evaluation based upon a geophysical survey of the development area.</li> </ul>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>Delivery and Legacy</p> <ol style="list-style-type: none"> <li>4. The development shall be delivered in accordance with the phasing and implementation plan.</li> <li>5. A mobility hub shall be delivered prior to the first occupation of the development with provision for its enhancement and expansion during later phases to be secured through a planning obligation.</li> <li>6. Where directly related to Dunton Hills Garden Village applicants will be required to make necessary, appropriate and reasonable financial contributions via planning obligations towards:               <ol style="list-style-type: none"> <li>a) off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;</li> <li>b) necessary bus services to nearby school facilities prior to the delivery of on-site school facilities which services shall be secured before first residential occupation of the development;</li> <li>c) phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase of the development;</li> <li>d) off-setting improvements to the Hartswood Golf Course.</li> </ol> </li> <li>7. Appropriate restrictions on the occupation of the development will be imposed subject to the carrying out and completion of necessary highway works to secure safe</li> </ol>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	and convenient access to the site, including any necessary improvements to the A128 corridor.	
	<p>8. Proposals shall include a supporting statement which addresses the long-term governance and stewardship arrangements (including the management, maintenance and renewal) of the green and blue infrastructure, the public realm, community and other relevant public facilities. Planning obligations will be sought to secure the long term funding, maintenance and stewardship of the assets where necessary.</p>	
	<p>9. Proposals shall include a supporting statement that includes initiatives to ensure that new jobs created are offered to local people, as far as may be reasonably possible.</p>	

## 2.11 Basildon Borough Council

- 2.11.1 Basildon Borough Council in their response to Question GEN 1.3 **[REP3-096]** highlighted that *Policy NE1: Conserving and Enhancing the Natural Environment* will be updated at the future Regulation 19 Consultation to include a *requirement on urban and brownfield sites for development proposals to apply the Urban Greening Factor (UGF) to quantify and secure high quality greening measures that deliver biodiversity net gain, climate resilience, and health benefits. Proposals are also encouraged to use Natural England's Environmental Benefits from Nature Tool to assess and demonstrate the wider environmental and social benefits of nature-based solutions.*
- 2.11.2 It is noted that the Regulation 19 Local Plan has not been subject to public consultation and as such this policy wording should be afforded very little weight. Urban greening is not something that the Project needs to be considered given that it affects farmland and not urban areas. The Project will replace habitats that are to be temporarily removed and will create new habitats in the Environmental Areas, but it does not propose to create new habitats elsewhere within the Order Limits. Biodiversity Net Gain is to be delivered by off site habitat creation and enhancement.
- 2.11.3 The Applicant acknowledges that Natural England's Environmental Benefits from Nature Tool can be used to assess and demonstrate the wider environmental and social benefits of nature-based solutions.
- 2.11.4 On this Project Environmental Net Gain (ENG) is to be delivered as part of the Off Site Biodiversity Net Gain. The factors that are considered in ENG including wider societal and community benefits, benefits for flood management etc. are factors that will be considered when selecting sites and schemes to deliver Biodiversity Net Gain off site.

## 2.12 Thurrock Council

- 2.12.1 In their response to Question GEN 1.3 **[REP3-088]** Thurrock Council noted that they had already identified relevant local plan policy in their Local Impact Report **[REP1-187]**. In reviewing the Thurrock Local Impact Report **[REP-187]** it was identified that there were policies which had not been included in the assessment presented in **5.7 Policy Compliance Document [APP-086]** or **8.4.2 Policy Compliance Tracker [REP1-133]**. For completeness these policies are set out below.

Table 2.6 Signposting of policy wording of any relevant adopted or emerging local plan policy (Thurrock Council)

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<b>Thurrock Core Strategy and Policies for Management of Development (as amended) (January 2015)</b>		
PMD2 - DESIGN AND LAYOUT	<p>1. The Council requires all design proposals to respond to the sensitivity of the site and its surroundings, to optimize the potential of the site to accommodate development, to fully investigate the magnitude of change that would result from the proposals, and mitigate against negative impacts.</p> <p>All development proposals must satisfy the following criteria:</p> <ul style="list-style-type: none"> <li>i. Character – Development must contribute positively to the character of the area in which it is proposed, and to surrounding areas that may be affected by it. It should seek to contribute positively to local views, townscape, heritage assets and natural features, and contribute to the creation of a positive sense of place.</li> <li>ii. Continuity – Development proposals must promote continuity of street frontages and provide active ground floor frontages as far as reasonably possible.</li> <li>iii. Public Realm – New development should contribute to improvements in the public realm by contributing sensitive planting, street furniture, appropriate lighting and public art where appropriate. The quality of the design and detailing of all development, including interfacing elements such as facades, steps and walls should be robust, engaging and contribute positively to the public realm.</li> <li>iv. Public and Private Amenity space – Development proposals must provide adequate public and private amenity space in accordance with Thurrock’s relevant</li> </ul>	<p>The Applicant has reviewed all parts of this policy and not all subsections are of direct relevance to the Project. In particular, no response has been devised for 1 (ii) to (vii) (inclusive) 1(ix) to (xii) (inclusive) or parts 2, 3 and 4.</p> <p>In response to Point 1(i) and 1(viii) the Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. The adopted design approach is set out within <b>6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]</b> which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent. The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. <b>6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]</b> describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate potentially significant adverse residual</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>adopted standards, particularly in areas with identified deficiencies. It should be attractive, safe, uncluttered, readily accessible and should promote play.</p> <p>v. Accessibility – Development proposals must allow easy and safe access for all members of the community. Development must also integrate land uses and all modes of transport but pedestrians and cyclists must be given priority over traffic in scheme design.</p> <p>vi. Permeability and Legibility – Development should promote connections between places that people wish to use, including public transport links, community facilities and the Greengrid. Development should be designed to help people find their way and must be legible for all members of the community, providing recognisable routes using landmarks and signage where appropriate.</p> <p>vii. Safety and Security – Development proposals must create safe and secure environments and reduce the scope for crime and fear of crime. Where appropriate, proposals should adopt the principles of Designing Out Crime set out in the Police Service’s publication ‘Secured by Design’.</p> <p>viii. Landscape – Features contributing to the natural landscape in the Borough, such as woods, hedges, specimen trees, unimproved grassland, ponds and marshes, will be protected and where appropriate enhanced to maintain their landscape and wildlife value.</p> <p>Provision and enhancement of landscape features will also be required to contribute to multiple uses and/or eco-system</p>	<p>effects. Key elements of the application of the mitigation hierarchy in respect of the Project include:</p> <ul style="list-style-type: none"> <li>• Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including ecology) assets</li> <li>• <b>7.2 Outline Code of Construction Practice [REP3-025]</b> provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project. <b>7.2 Outline Code of Construction Practice [REP3-025]</b> is secured by Requirement 4 in <b>3.1 Draft Development Consent Order [REP3-004]</b>.</li> </ul> <p>The Applicant has sought to minimise adverse visual effects through the good design initiatives. National Grid has sought to identify locations for the Tilbury North substation and CSE compounds which are able to take advantage of screening which is provided by existing tree belts and woodland areas. The land around National Grid permanent assets, where there is sufficient space, have been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value.</p> <p>The Applicant notes that the Building for Life 12 (BfL 12) is an industry standard for the design of new housing developments and as such is not relevant to the Project.</p> <p>The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>services, including amenity, recreation, flood alleviation and Sustainable Urban Drainage Systems.</p> <ul style="list-style-type: none"> <li data-bbox="398 320 1249 427">ix. Diversity – Development proposals must promote variety and choice through a mix of mutually compatible developments and uses.</li> <li data-bbox="398 451 1249 595">x. Utilities – Development proposals must accommodate public services and utilities without compromising design and layout. This includes providing suitable access to maintenance, waste and emergency service vehicles.</li> <li data-bbox="398 619 1249 802">xi. Energy and Resource use – Development should be designed to minimise energy and resource use. This includes integrating sustainable construction techniques, siting and orientation of buildings to maximise energy and water efficiency.</li> <li data-bbox="398 826 1249 970">xii. Layout – The layout of all development should optimise the assets of the site, while conforming to the appropriate standards for layout, design and access set out in the Layout and Standards SPD.</li> </ul> <p data-bbox="353 994 1249 1444">2. In the interests of encouraging good design the Council will require residential developers to carry out robust assessments of their proposals using the Building for Life 12 questions, where the questions are relevant to the development being proposed, and submit such assessments in support of planning applications. The Council will use these questions as the basis for discussions with intending developers both before and after submission of planning applications. The objective will be to arrive at a mutually agreed assessment of proposals prior to a decision being made where there are no ‘red’ outcomes and where the only ‘amber’ outcomes are those</p>	<p data-bbox="1265 217 2123 738">Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders. The design considerations have taken place within the context of meeting National Grid’s duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely. Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in <b>5.6 Planning Statement [APP-085]</b>, <b>7.15 Design and Access Statement [REP2-020]</b> and <b>7.16 Design Approach for Site Specific infrastructure [APP-354]</b>.</p> <p data-bbox="1265 746 2123 1010">The Applicant has appointed a Development Design Champion (DDC) from within National Grid’s existing design governance structure. The role of the DDC is to ensure a consistent design language in line with National Policy Statement (NPS) EN-1 (2024), NPS EN-5 (2024), the Holford and Horlock Rules, and other relevant guidance will be followed through in post-consent decisions.</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>where the characteristics of the site and its circumstances are such as to make ‘green’ outcomes unachievable.</p> <ol style="list-style-type: none"> <li>3. The Council will encourage pre-application discussions and design review of development proposals by the Commission for Architecture and the Built Environment (CABE) and/or other relevant bodies, and in relation to proposals having a wider impact, will wish to see that developers have worked closely with local communities to arrive at proposals that take account of their views.</li> <li>4. Where the Council has produced a design brief for a site or sites, developers will be obliged to meet its detailed requirements.</li> </ol>	
<p>CSTP9 – WELL-BEING: LEISURE AND SPORTS</p>	<p>The Council and Partners will support the delivery of a physically active, socially inclusive and healthy community through the provision of high quality sports and leisure facilities and appropriate spaces for those that live, work, and visit the borough. To achieve this, the Council and Partners will:</p> <ol style="list-style-type: none"> <li>1. New and Existing Facilities <ol style="list-style-type: none"> <li>I. Safeguard existing and future provision of leisure, sports and open space facilities. The Council will only allow the loss of a particular facility where appropriate alternative provision can be made elsewhere.</li> <li>II. Support the provision of new or improved leisure and sports facilities to address deficiencies identified in the Thurrock Outdoor Sports Strategy, Sports and Active Recreation Strategy and the Community Needs and Open Spaces Study.</li> <li>III. Promote smaller-scale sports and leisure facilities in town centres, local centres and Lakeside Regional centre.</li> </ol> </li> </ol>	<p>Whilst the Project is not proposing new leisure and sports facilities and therefore much of the policy is not relevant, Part 1 I has been addressed.</p> <p>A comprehensive assessment of impacts of the Project on open space and recreational opportunities is made within Appendix B of <b>5.6 Planning Statement [APP-085]</b>. Appendix B considers impacts both during construction and operation. Appendix B, and the accompanying text in Sections 7.3.430 – 7.3.476 of <b>5.6 Planning Statement [APP-085]</b>, display that the Project complies with relevant policy on open space and recreation as set out in National Policy Statement (NPS) EN-1. In Thurrock, nine sites (OS/104 – OS/112) that are considered open space/green infrastructure are identified as either being within or adjacent to the Order Limits and are assessed within Appendix B. Of these nine sites, no development is proposed in three of them. This includes OS/104 and OS/109, where overlaps with the Order Limits exist but no development will be taking place within them and OS/110</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
<p>IV. Ensure that new or improved facilities are in locations that are accessible to the local community and create or improve links to Thurrock’s network of green and historic infrastructure, including the Thames riverside.</p> <p>V. Provide facilities for schools and other institutions which can be linked and shared with the community.</p> <p>VI. Where appropriate, encouraging development proposals that seek to support the development of the Olympic and Paralympic Games and legacy.</p> <p>VII. Ensure that the potential health impacts of development are identified and addressed at an early stage in the planning process.</p> <p>2. Key Sites</p> <p>I. The Council will work with relevant partners to progress the development of key flagship leisure and sports facilities at key locations to promote regeneration. The identified flagship sites include:</p> <p>i. Sports and Well-Being Hubs (initially at Belhus, followed by facilities at Blackshots-North Grays)</p> <p>ii. Leisure and sports facilities for Lakeside will be identified and set out in the relevant Development Plan Documents.</p> <p>II. The Council will review the potential for enhanced leisure facilities at Grays river front.</p> <p>III. A Supplementary Planning Document will be prepared at a future date to consider the issues of health and wellbeing with regard to Chadwell St. Mary and Tilbury.</p>	<p>which falls outside the Order Limits. Four of the sites (OS/108, OS/109, OS/111 and OS/112) are included within the Assessment as they overlap with the Order Limits as a result of works to the existing YYJ and ZB 400 kV overhead lines. These four sites interact with the extent of the YYJ and ZB lines specified in Scenario A for connection to the Tilbury North Substation as set out in Section 11.4 of <b>5.15 Design Development Report [APP-122]</b>. As set out in the Applicant’s Letter to the Examining Authority dated 9 February 2026 <b>[AS-084]</b>, the Applicant has confirmed that it intends to pursue Scenario B for connection to the Tilbury North Substation (Section 11.4 of <b>5.15 Design Development Report [APP-122]</b>). Scenario B consists of more limited modifications to the existing YYJ and ZB lines. Resultantly, works will no longer be taking place on or near to these four sites. Works to existing overhead line infrastructure associated with the 400 kV PAB are proposed within site OS/107 (Linford Pit - local wildlife site). These works will be temporary in nature. The site is in private ownership with no public access and so there will be no impact on recreation or leisure. The site has been included within the open space assessment on a precautionary basis as it falls within the definition of green infrastructure. Elsewhere, where temporary disruption is caused to these areas it is not considered that this will have material impacts on the physical wellbeing of local populations, in terms of access to open space. Appendix B.3 of <b>5.6 Planning Statement [APP-085]</b> explains that there is significant alternative open space provision in the locality of Maple Park (not including Maple Park itself, which will retain much of its current function). It is established below that</p>	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	<p>The sites will be included in the Adopted Site Specific Allocations and Policies DPD and identified on the Proposals Map.</p> <p>3. Developer Contributions</p> <p>Proposals for new development will be required to contribute towards the leisure and sports needs generated by the development and address any deficiencies in the locality that they may generate or exacerbate</p>	<p>significant golf course provision also exists in the wider locality of Orsett.</p> <p>Construction works will take place, and permanent infrastructure will be sited, in both Maple Park (OS/105) and Orsett Golf Course (OS/106). Whilst efforts have been made to avoid these open space sites, this has not been possible. Detail on the implications for these open space sites is set out below. Maple Park (OS/105) Based on the indicative pylon locations in the alignment, there are two pylons TB257 and TB258 which are proposed to be sited in the south west corner of Maple Park and rights are proposed to be acquired for a permanent access road to access these pylons. The siting of these pylons within Maple Park will also entail an oversail between them. It is proposed that the permanent access route will utilise an existing track. Appendix B.3 of <b>5.6 Planning Statement [APP-085]</b> considers the impacts of the permanent siting of the two pylons which would entail the loss of open space around the base of the pylon footprint. Whilst the use and function of the open space in this part of the park will be impacted by the siting of the pylons, the impact will be restricted to a small section of Maple Park (which is furthest away from residential development) with impact limited to the pylon/tower base foundations (approximately 34 sqm in total) in the context of a park which is significant in size (42.3 ha). Notwithstanding this, an assessment of the provision of open space has been completed in line with paragraph 5.11.10 of National Policy Statement EN-1. Appendix B.3 establishes that there is a significant surplus of open space in the locality. This surplus provides ample alternative opportunity for participation in physical activity. Therefore, not only will opportunities for use of this area of</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>open space within Maple Park be largely unchanged as the two pylons occupy a small area in the south-western corner of Maple Park. The wider Maple Park (not included within the area of Surplus land identified in the assessment made in Appendix B.3) will also be available for participation in recreation, leisure and physical activity once the Project is constructed and there is a significant surplus of open space in the locality. Orsett Golf Course (OS/106) At Orsett Golf Course, the 16th and 17th holes will be oversailed, and pylon TB262 will be sited between a practice area and the south of the 16th green. Due to route constraints and environmental features along with the need to connect to Tilbury North Substation, the overhead lines must take a route across this part of the golf course. The Limits of Deviation were drawn to allow for appropriate flexibility to agree details with Orsett Golf Course. Positive engagement has taken place between the golf course and the Applicant in relation to mitigation, and this has led to the identification of an agreed solution, the details of which are being finalised through a Statement of Common Ground. This includes a minor change to the routeing to ensure as little impact as possible to the 16th and 17th holes. Effects on the practice ground have been identified and an agreement to modify the practice facility provision has been reached as a result. The agreed alignment sees pylons positioned to the north of the 17th fairway and to the south of the 16th fairway (with no pylon between the fairways) with connections to gantries positioned to the edge of the substation site. Impacts of the Project on Orsett Golf Course are set out at length in Sections 7.3.472 – 7.3.473 and 7.3.593 – 7.3.596 of <b>5.6 Planning Statement [APP-085]</b>. The implications for open space are detailed in</p>

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		<p>Appendix B (site reference OS/106). The assessment within Appendix B, and mitigation currently being discussed, display compliance with the requirements of NPS EN-1. Appendix B, as summarised, acknowledges an impact as a result of the pylon located within the practice area and oversailing. However, it notes that there will be no loss of the golf course facility which will remain available for use. Fundamentally, this assessment concludes that the benefits of the Project (including need) outweigh the impact on the practice area at this facility and as explained above, positive engagement has taken place between the golf course and the Applicant in relation to mitigation, and this has led to the identification of an agreed solution, the details of which are being finalised through a Statement of Common Ground.</p> <p>The permanent impact of the Project will be limited to two small specific areas of much larger areas of open space, being Maple Park and Orsett Golf Course. The Project would not prejudice the provision of open space in these areas for access to leisure and sports facilities. In the case of Maple Park, a small area of a much larger open space will be impacted. In the case of Orsett Golf Course, efforts have been made to limit impact, and an agreement has been reached which mitigates potential impacts on the golf course. Elsewhere, as set out above, there may be temporary impacts on areas of open space associated with construction of the Project. However, Policy CSTP9 relates to safeguarding against the loss of open space facilities. Open space will not be lost in areas where temporary works are proposed as these areas will be reinstated following the completion of works.</p>

### 3. Signposting for how the Project has had regard to Neighbourhood Plan Policy

Table 3.1 Signposting of policy wording of relevant adopted and emerging Neighbourhood Plan policy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Boxted Neighbourhood Plan	LC1: Coalescence with Colchester Urban Area	Developments in Boxted parish which can be demonstrated to be sustainable and which do not materially reduce the green gap between Boxted and urban Colchester will be supported. This must reflect the requirements of Policy SB1 in respect of development outside of settlement boundaries.	The Project is routed through the Green Gap identified in Figure 5.2 of the Boxted Neighbourhood Plan. The Applicant notes that the objective of the policy is to ensure that the growth of Colchester urban area does not serve to reduce the gap between Colchester and Boxted, thereby eroding Boxted's function as a rural settlement. The proposed pylons constitute permanent vertical structures, they do not amount to settlement growth nor alter the defined edge of settlements. Accordingly, the scheme does not undermine the core objective of preventing coalescence.
West Bergholt Neighbourhood Plan (2019)	PP1: Protection of Community Facilities	All development proposals must ensure that they do not give rise to adverse impacts on the quality of life and wellbeing of the local community and provide enhancements wherever possible and, where appropriate, promote diversity and enhance community cohesion through the provision of new multiuse facilities or contributions to existing facilities.  The loss of existing community buildings will be resisted unless it can be demonstrated through a	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the landscape and people's views between Dedham Vale National Landscape and West Bergholt. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		<p>combined Marketing Assessment and Viability Report demonstrating that the property has been marketed for not less than 12 months and confirming that there is no longer an effective demand for the existing use within the locality and there is no viable alternative community use for the site, meeting the needs of the local area.</p>	<p>National Landscape, having applied the EN-5 policies. Details are set out in <b>5.15 Design Development Report [APP-122]</b> and <b>5.6 Planning Statement [APP-085]</b>. The Project has therefore complied with the relevant EN-5 policies on undergrounding.</p> <p>Effects on visual receptors within Visual Receptor Areas (VRA), D6 West Bergholt are set out <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]</b>. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation.</p> <p>With regard to the latter part of the Policy, the Project will not result in the loss of any community buildings.</p>
	PP2: New Community Facilities	<ol style="list-style-type: none"> <li>1. Proposals that improve the quality and/or range of community facilities, particularly those for younger and older age groups, will be supported</li> <li>2. provided that the development is of a scale appropriate to the needs of the locality and is conveniently accessible for residents of the village.</li> </ol> <p>Provision for a parish office/community hub will be supported.</p>	<p>It is important to consider the need case within the context of this policy. <b>7.17 Strategic Options Backcheck and Review [APP-355]</b> Section 3 'Need Case' pages 28-38 sets out the need for the Project and includes setting out where demand centres are located across the country</p> <p>3.1.6 page 20 states <i>'Electricity demand is especially concentrated in large urban areas, including urban areas in the M62 corridor, the M18 corridor, the Midlands, the M4 corridor and the Southeast. The transmission system carries bulk energy from the generators to points on the network where that power is taken onto the distribution networks for onward transmission to homes and businesses across England and Wales. As the country</i></p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			<p><i>decarbonises, this demand for energy will increase and replace fossil fuel usage.'</i></p> <p>Section 3.3.7 page 23 also states: <i>'The wider Southeast area, is made up of the 400kV and 275kV network which connects generation and demand in the major towns and cities of the wider Southeast and Midlands regions.'</i></p> <p>So power is not just supplying London, but the whole south east and midlands regions and the towns and cities within these regions.</p>
	PP12: Coalescence Development	Development will not be supported in the area shown on Map PP12 if individually or cumulatively it would result in increasing the coalescence between West Bergholt village and Braiswick, reducing their separate identity by reducing the separation between these two settlements.	Map PP12 illustrates an area to the east and south of West Bergholt identified as a prominent slope where development should be avoided to avoid coalescence with Colchester. The Project is located to the north and west of Bergholt and does not cross the area identified on Map PP12.
	PP20: Access	Development proposals demonstrating designs that incorporate safe pedestrian and vehicular access and adequate sight lines will be supported.	All temporary highway access points (including those between TB37 and TB38 along with permanent access points have been designed with regard to prevailing design standards and will be agreed with Essex County Council through the technical approval (incorporating Road Safety Audit) process.
	PP21: Traffic Congestion	Where development proposals are likely to add to traffic congestion in the village or encourage through or additional traffic on rural lanes causing significant harm, proposals that include sustainable measures to mitigate unacceptable traffic impact, or contribute funding towards	The Applicant is committed to minimising disruption on local highway networks and acknowledges the need to provide advance warning of works in areas that may be impacted by road closures relating to construction traffic. Detailed in paragraph 5.4.23 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> , signs are proposed on sections of

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		appropriate sustainable village transport safety schemes, will be supported.	<p>the Major Road Network, Strategic Road Network and Primary Access Routes which may be subject to temporary traffic congestion and delay.</p> <p>As noted in Section 6.5 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>, members of the community and local businesses will be kept informed regularly of the works through active community liaison. Section 3.3 of <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> sets out the expectation of the Main Works Contractor for community engagement and public information sharing during construction. The Main Works Contractor(s) will implement a system to provide information to local residents and occupiers about the works. A community relations team will be appointed to provide dedicated community relations and external communication support during construction. The community relations team will maintain a Project website, which will act as a central source of information for the general public.</p>
	PP23: Sustainable Transport	Where appropriate and subject to viability, new development which offers contributions to encourage walking, cycling and public transport use, in mitigation commensurate with the scale and likely impact of the proposed development, will be supported.	<p><b>7.11 Transport Assessment [APP-333]</b> provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b> provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
<b>Marks Tey Neighbourhood Plan (2022)</b>	Policy MT12- Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)	All residential development within the zones of influence of Habitat Sites will be required to make a financial contribution towards mitigation measures, as detailed in the Essex Coast RAMS, to avoid adverse in-combination recreational disturbance effects on Habitat Sites. In circumstances where the preferred approach of a developer contribution is not secured, residential development within the zones of influence will need to deliver all necessary measures (including strategic measures) in accordance with a project-level Habitats Regulations Assessment setting out how any recreational disturbance impacts will be avoided and/or mitigated in compliance with the Habitats Regulations Assessment and Habitats Directive.	<p>optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>, the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for workers arriving and departing from site, including the assessment assumptions.</p> <p>This policy is noted, its emphasis on residential development is not of direct relevance to the Project. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, ancient woodland and veteran trees, during the construction and operation (including maintenance)</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Policy MT01 – A12, A120 and station infrastructure improvements	<p>Any development proposals found to be generating significant transport movements, the impacts of which would be severe, will not be supported in advance of the A12 road widening scheme and a dualled A120 from Braintree to the A12 being delivered. Furthermore, any such development proposal should be accompanied by:</p> <ul style="list-style-type: none"> <li>evidence that road capacity is in place in Marks Tey, taking into account current and forecast traffic volumes along the A120 and A12; and</li> </ul>	<p>phases. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will achieve at least 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation/enhancement. This is reported in <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. There is currently no legislative requirement for BNG in respect of infrastructure projects for which development consent is required.</p> <p>To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared <b>[APP-082]</b>.</p>	<p>A Transport Assessment [APP-333] has been produced for the Project. The Transport Assessment has been developed in line with DLUHC guidance (Travel Plans, Transport Assessments and Statements) and relevant TAG (formerly WebTAG) principles. The Traffic and Transport environmental effects have also been assessed and are reported in ES Chapter 16: Traffic and Transport [APP-271], using a methodology based on both DMRB and GEART guidance. Both National Highways and the relevant highway authorities have been consulted on the scope of the Transport Assessment (see Appendix 16.1: Engagement Undertaken Relevant to</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		<ul style="list-style-type: none"> <li>mitigation measures necessary to protect the residential and street-scene environment along Coggeshall Road from traffic-related environmental impacts including noise and vibration, and poor air quality. Proposals which are designed to lead to an overall reduction in traffic volume along the A120 are welcomed.</li> </ul> <p>Other development proposals that will generate additional traffic movements in the parish will only be supported if it can be demonstrated through a transport assessment or, in the case of smaller schemes, in an accompanying Design and Access/Planning Statement, that the traffic impacts of the development on the A120 and the A12 will not lead to unacceptable adverse impacts on residential amenity in the parish, or the street scene environment along Coggeshall Road (through the generation of traffic-related noise, air pollution or disruption) or on road safety for all vulnerable users including pedestrians, cyclists and equestrians.</p> <p>Development proposals involving expanded facilities (including passenger car parking) at Marks Tey train station should be assessed for their impact on road safety, pedestrian safety and residential amenity in Marks Tey parish. Where potential adverse impacts are identified, proposals will only be supported if accompanied by measures which monitor and, if applicable, appropriately mitigate impacts (for example through further strengthening and widening the North Lane/Station Road rail bridge, street scene</p>	<p>Traffic and Transport of the ES Chapter 16: Traffic and Transport [APP-272] and the ES traffic and transport assessment, and their comments have informed both assessments.</p> <p>Operational effects to the transport network were scoped out of the assessment due to the very low level of anticipated traffic. The Transport Assessment [APP 333] assesses the potential for temporary disruption to transport infrastructure during construction.</p> <p>The Applicant is engaging with National Highways regarding the assessment of the temporary impacts of the Project at the A12 J25 at Marks Tey and with National Highways and Essex County Council regarding the A120 and expects to reach agreement as to whether mitigation is needed by the end of the DCO Examination.</p> <p>Appendix B Outline Construction Worker Travel Plan of the Outline CTMP [APP-311] contains the, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Outline Construction Worker Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.</p> <p>The Outline Construction Worker Travel Plan will be developed into a final detailed Construction Worker Travel Plan by the Main Works Contractor(s) should development consent be awarded.</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		<p>enhancement measures along Station Road, screening of noise, pollution or visual impacts).</p> <p>To be supported, proposals must maintain existing passenger accessibility at the station and seek to take opportunities to secure improvements in passenger accessibility.</p> <p>Proposals likely to have residual unacceptable impacts on road safety and residential amenity will not be supported.</p>	
<b>Eight Ash Green</b>	Businesses Policy 1 (BP1)	<p>Moat Farm (shown on the Eight Ash Green Neighbourhood Area Policies Map) is designated as a business area.</p> <p>Proposals should demonstrate how likely significant adverse environmental effects of development will be mitigated during construction, subsequent use and estate management, as appropriate. Proposals encouraging more sustainable means of transport will be supported.</p>	<p>The Applicant notes the location of the Moat Farm business area which is remote from the Project Order Limits.</p> <p>The Environmental Statement (Volume 6 of the development consent application) provides an assessment of the likely significant effects in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The scope of the assessment was undertaken in accordance with <b>6.19 Scoping Report [APP-288 – APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b>. <b>Volume 6 Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]</b> incorporates comprehensive baseline data and applies assumptions to assess worst-case scenarios. Moreover, post-consent control mechanisms are standard industry practice. <b>Volume 6 Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]</b> assesses the Limits of Deviation within the ‘sensitivity testing’ section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed.</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Kelvedon	Policy DE1	<p>DESIGN OF NEW DEVELOPMENT</p> <p>All new developments should, where appropriate, ensure that:</p> <ol style="list-style-type: none"> <li>The scale, height and massing fits unobtrusively with the existing building, (or in the case of new dwellings, the curtilage), and the local character of the street scene,</li> <li>The development makes a positive contribution to the local character and scale of the area,</li> <li>The spacing between buildings respects the character of the street scene,</li> <li>The gaps which provide views out of the village to surrounding countryside are maintained,</li> <li>The materials are compatible with the materials of the existing building,</li> <li>The traditional boundary treatment of an area is retained, and where feasible, reinforced, and</li> <li>The privacy, daylight, sunlight and outlook of adjoining residents, are safeguarded.</li> </ol> <p>Development proposals should have regard to the Kelvedon Design Guide and where a Design and Access Statement is provided it should demonstrate how this has influenced proposals.</p>	<p>Good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. NPS EN-1 and NPS EN-5 (both 2024) set out the requirement to deliver good design, and in developing the Project the Applicant has responded to the criteria by which it will be assessed, using the guidance of the Holford Rules and the Horlock Rules. <b>7.15 Design and Access Statement [REP2-020]</b> sets out how the Project reflected the four principles of good design in the Planning Inspectorate’s ‘Advice on good design’. The majority of the Applicant’s infrastructure for the Project is located above ground. The key design objective was to ensure that this infrastructure was integrated successfully into its surroundings having regard to National Grid’s statutory duties under the following:</p> <ul style="list-style-type: none"> <li>Electricity Act 1989: Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission</li> <li>Section 38 and Schedule 9 duties to preserve natural beauty and mitigate environmental effects</li> </ul>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			<ul style="list-style-type: none"> <li>• Industry-standard Holford Rules for overhead line routing and Horlock Rules for substation siting</li> <li>• The then-current policy framework (including the 2011 National Policy Statements EN-1 and EN-5) which was the relevant policy framework during the design stage of the Project</li> <li>• NPS EN-1 (2024) and NPS EN-5 (2024) which are the policies relevant to the Project.</li> <li>• In <b>7.15 Design and Access Statement [REP2-020]</b>, the Applicant has now fulfilled the requirement to appoint a Design Champion role. Given the current stage of the Project, this will consist of two complementary roles: <ul style="list-style-type: none"> <li>• Development Design Champion (DDC), formally appointed from the existing Project Design Team</li> <li>• Delivery and Detail Design Champion (DDDC) from the Great Grid Partnership, who will be responsible for detailed design during the delivery phase.</li> </ul> </li> </ul> <p>Together, the DDC and DDDC will ensure design leadership and continuity across the full Project lifecycle. The appointment of a Design Champion is supported by NPS EN-1, National Infrastructure Commission Design Principles and the Planning Inspectorate Advice on Good Design.</p> <p>The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>,</p>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			<p><b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232] and 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Parts 1 and 2 [APP-233 to APP-234].</b> The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.</p>

# Abbreviations

Abbreviation	Full Reference
AIS	Air Insulated Switchgear
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CPRSS	Corridor and Preliminary Routeing and Siting Study Report
CSE	Cable Sealing End
DCO	Development Consent Order
DNO	Distribution Network Operators
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESO	Electricity System Operator
GIS	Gas Insulated Switchgear
GW	Gigawatts
kV	Kilovolt
NSIP	Nationally Significant Infrastructure Project
NETS	National Electricity Transmission System
NETS SQSS	National Electricity Transmission System Security and Quality of Supply Standard
NGET	National Grid Electricity Transmission
Ofgem	Office of Gas and Electricity Markets
PEIR	Preliminary Environmental Information Report
SOBR	Strategic Options Backcheck and Review
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

# Glossary

Term	Description
Alignment	The proposed overhead line and underground cable route.
Ancient woodland	Land that has been continually wooded since at least 1600 in England. Regarded as 'irreplaceable habitat' in national planning policy and guidance. Ancient woodland greater than 2 ha is recorded on the Natural England Ancient Woodland Inventory.
Biodiversity	The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part: this includes diversity within species, between species and of ecosystems.
Biodiversity Net Gain	An approach for developments to ensure habitats for wildlife are left in a measurably better state than they were before the development.
Cable	An insulated conductor designed for underground installation.
Cable Sealing End compound	Electrical infrastructure used as the transition point between overhead lines and underground cables. A compound on the ground acts as the principal transition point.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as defined in s69(1)(a) in the Planning (Listed Building and Conservation Areas) Act 1990.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Distribution Network Operator	Companies that own and operate the power lines and infrastructure that connect the National Grid network to individual properties.

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# Appendix A.

# Planning Policy

# LPR 26

# Appendix A

## Braintree District Council Local Plan Review 2041 Preferred Options Consultation (Regulation 18) (March 2026) Planning Policy LPR 26

### SGL - Kings Dene - North, West and South West of Kelvedon

- A.1.1 Land to the north west and south west of Kelvedon, as shown on the Proposals Map, is allocated for a high-quality comprehensively planned sustainable extension to Kelvedon and Feering based upon Garden Communities Principles that will provide a significant amount of new housing and employment development, and will maximise opportunities for active and sustainable travel, in a landscaped led design setting.
- A.1.2 An Outline Planning Application including Parameter Plans, Design Code and Illustrative Masterplan (including the phasing of development and delivery of infrastructure) will be collaboratively prepared for the entire site. Collaboration with site promoters, landowners, Braintree District Council, Essex County Council, Parish Councils and other key stakeholders (including community engagement). This document will be further informed by public participation in the process.
- A.1.3 To ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the approved masterplan and will not prejudice the implementation of the site as a whole. The development is expected to be planned and delivered in a holistic way and not as smaller portions of separate development. Development proposals which could compromise the delivery of an identified Strategic Growth Location will be resisted.
- A.1.4 The Outline Parameter Plan, Design Code and Illustrative Masterplan should:
- Provide a strategic development framework which will define key development principles and strategic concepts to enable a co-ordinated approach to delivering the planned level of growth
  - Be informed by a comprehensive assessment of the site and key opportunities and constraints
  - Develop an over arching vision and objectives for the creation of high quality development, outlining how the vision and objectives have been developed through collaborative working, including with the local Parish Councils, Neighbourhood Committees and the local communities
  - Explain how the identified vision and objectives for the site will be secured
  - Encompass the requirements of the 'Building with Nature' Standards into the master planning process to ensure that nature is given space
  - Outline how infrastructure requirements for direct road access from the A12, improvements to the local road network, amendments to the Level Crossing at Church Hill and access over the Great Eastern Main Line railway will be delivered and phased to ensure that the current residents and communities are not inconvenienced and that the historic core of Kelvedon is protected

- Identify requirements for future planning applications associated with the site to ensure that if a phased approach is used there is an overall cohesive and sustainable plan that is responsive to the changing needs of the local parishes (Kelvedon, Feering, Coggeshall and Rivenhall). This shall be achieved through a Design Code
- Be informed by an independent quality review panel during the progression of the Outline Parameter Plan, Design Code and Illustrative Masterplan and is supported
- Allow for small and medium house developers, self build and bespoke build opportunities including co-housing developments within the masterplan for the site.

A.1.5 To incorporate appropriate 'place shaping' principles the Outline Parameter Plan, Design Code and Illustrative Masterplan should:

- Establish key routes and linkages within the site and to the wider area connecting to neighbouring villages and parishes and Districts recognising the role that Kelvedon Rail Station and the A12 junctions play in the movement and variety of modes of transport around the area.
- Maintain and enhance the important features, character and heritage assets within the site and the wider parish that will be impacted by the development;
- Conserve and where appropriate enhance landscapes, habitats and biodiversity including connections to the wider green and blue infrastructure network, mitigating the visual, biodiversity and heritage impacts of the development.
- Preserve or enhance the character or appearance of the Kelvedon Conservation Area and the setting of Felix Hall and its environs and provide a generous landscape buffer to preserve the settings of nearby heritage assets including St Mary the Virgin Church, Felix Hall and its environs, Felix Place, Clark's Farm, Snivellers Lane, Park Farm, The Rook Hall, Leapingwells Farm, Pantlings Lane, Monks Farm, Pound Farm, St Marys and All Saints Church Rivenhall, Hoo Hall.
- Ensure that the distribution of new community facilities consider the existing and new residents and responds to creating linkages to facilitate active travel linkages to them. Development will be expected to provide:
  - Around 5,600 new homes of a mixed size and type as identified within the Strategic Housing Market Assessment including affordable housing and specialist residential accommodation. The final amount of new homes will be confirmed through the planning application process.
  - Appropriate employment land including employment generating uses at local centres to support a major new community. The location and extent of large warehousing and commercial developments shall respect the landscape setting of Kelvedon and Feering, and in doing so recognise the existing gap between Kelvedon, Rivenhall and Rivenhall End and to ensure that the two remain as distinctly separate communities.
  - Provision of land and financial contribution for the provision of a Gypsy and Traveller site.
  - Neighbourhood centres incorporating provision for convenience food outlets, community and healthcare provision.

- Provide or make financial contributions to Early Years Provision, Primary School Provision and Secondary School Provision as required by the Essex County Council Local Education Authority
- Provision of and/or financial contributions towards provision of other community facilities including healthcare provision as required by the NHS and Police, Fire & Rescue and ambulance facilities. New healthcare provision shall be located as to be accessible for both existing and new residents and to ensure those that are infirm or unable to drive are able to easily access it by regular public transport means.
- Appropriate provision of community spaces to provide for both formal and informal activities including social and sports (indoors and outdoors), gardens and allotments.
- All new external publicly accessible spaces are to be to be capable of multifunctional green, and where appropriate blue, infrastructure including SuDS features which are to respect the existing landscape and topography features and to be designed in such a way as to be positive landscape features.
- Access to the site shall be provided through improvement to Coggeshall Road to the north-east with access from the south west being via the A12.
- Provide well-connected internal road layouts which allow good accessibility for bus services and bus priority measures both within the strategic allocation site and to the railway station and existing village amenities.
- Provide an effective movement strategy within and to outside of the site with connections to Kelvedon, Coggeshall, Silver End and Rivenhall.
- Provide new and improved existing pedestrian, cycle and where appropriate bridleway connections within the site and to the wider area including to existing villages, railway station, proposed business areas including those planned for Feering's Strategic growth allocation and the new Country Park.
- Provide safe and convenient multiuser connections within the site and to the wider area including Kelvedon Railway Station and enable closure of existing level crossing.
- Provide measures for sustainable travel modes throughout the site and within Kelvedon that offer travel choice for people by non-car modes.
- Improvements and contributions to the local and strategic road network as required by the Local Highways and Transport Authority.

## Design and Layout

A.1.6 Development is to be designed:

- Around a comprehensive coherent framework of routes, blocks and spaces that deliver areas of distinct character whilst respecting the current landscape character, setting of the existing villages and visual impact of proposals.
- To provide a network of coherent public open spaces, formal and informal sports, recreation and community spaces within the site and to enable is easy access to such from the existing village.

- To integrate both historic and landscape features of the surrounding rural and urban context.
- To incorporate renewable, low carbon and decentralised energy schemes on this site together with mass waste collection systems where appropriate.

## Stewardship

- Establish a robust and sustainable stewardship structure early on in the planning and delivery process
- A Stewardship Statement to accompany the first outline planning application providing full details of a) the governance structure and methods of funding of the proposed stewardship vehicle, b) public spaces and community assets to be owned, managed and maintained by the proposed stewardship vehicle and c) an indicative programme for the establishment and operation of the proposed stewardship vehicle
- A Stewardship Strategy to be provided as part of the site specific agreement to include a) a robust governance strategy of the chosen stewardship vehicle, b) a full Business Plan for the chosen stewardship vehicle and c) arrangements for maintenance, management and monitoring of public spaces and community assets
- Stewardship activities are required to be in place in advance of the first housing occupations to ensure timely delivery of community development activities

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