AENC-NG-CNS-REP-0054

# Norwich to Tilbury

## Volume 5: Reports and Statements

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

**Final Issue D**

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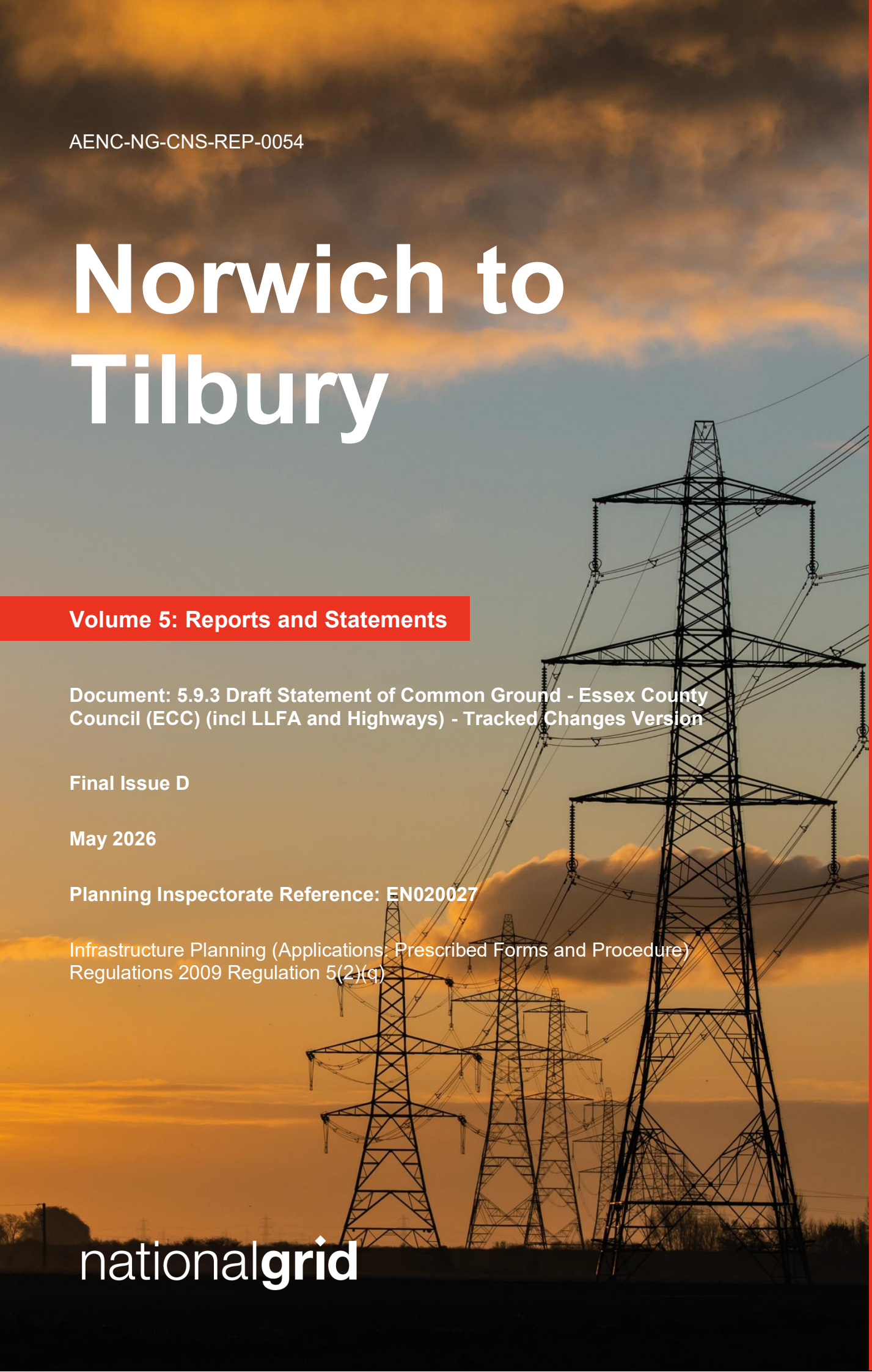

nationalgrid

# Revision History

| Version | Date | Submitted at |
|---|---|---|
| A | 29 August 2025 | DCO Application |
| B | 26 February 2026 | Deadline 1 |
| C | 12 March 2026 | Deadline 2 |
| D | 12 May 2026 | Deadline 4 |

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# 1. Introduction

## 1.1 Overview

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

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to ECC. The applicable matters considered within this SoCG apply to ECC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section ~~3~~3):

- Project development, description and design
- Ecology and Biodiversity
- Green Infrastructure
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- Cumulative Effects
- Development Consent Order
- Other Matters

## 1.2 Summary of matters Under Discussion

1.2.1 As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are Under Discussion, together with a deadline by which such matters are expected to be resolved.

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| **Project development, description and design** | | |
| 3.2.5 – Policy compliance | ECC sought legal advice to confirm there is presumption in favour of approving a NPS compliant scheme unless one of a range of specified exceptions applies.<br>Norwich to Tilbury has been developed in line with National Planning Policy (EN-1, EN-3, EN-5). This position is provided in Section 4.2 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | Resolution likely by Deadline 7. |
| 3.2.6 – Dunton Hills Garden Village (DHGV)<br>3.15.1 – Dunton Hills Garden Village Viability | ECC maintain the proposal would degrade the principles of a Garden Village and is likely to lead to a reduction in property prices, which would be to the detriment of the viability and deliverability of housing and infrastructure delivery.<br>The Applicant has taken into account the potential effect of its proposals when developing the alignment and works within the context of the planning status of other projects including DHGV. The Applicant's position is that deliverability of DHGV is not prejudiced by the Project. Further detail on this position is provided in Section 3.8 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | Resolution likely by Deadline 7. |
| 3.2.7 – Design principles | ECC feels there is an opportunity to be innovative in the approach to design and suggested the Applicant must follow a good design process to ensure that infrastructure remains functional and safe while considering best local design and environmental outcomes, especially around the EACN.<br>The primary design requirement for electricity infrastructure is that it must be safe and sure, acknowledging functional constraints. While the overall design is largely fixed, smaller design details, such as the colour of finishes, are agreed upon and documents through the DCO process. This position is provided in Section 3.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | Resolution likely by Deadline 7. |
| 3.2.8 – 3.2.11 - Consultation | ECC acknowledges that the 2022, 2023 and 2024 consultations were undertaken in accordance with the Consultation Strategy and Statement of Community Consultation (SoCC), though query the targeted consultation process completed in 2025.<br>The Applicant undertook consultations in accordance with the respective consultation strategies and SoCC, and responses to feedback are contained | This matter is unlikely to be agreed |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | within the **5.1 Consultation Feedback Report [APP-066]** | |
| 3.2.12 -Community Benefits | ECC strongly encourage NGET to positively respond to the issue of social value and community benefits. In particular, ECC believe significant benefits should be realised from N2T for education, skills, and employment during construction and operation.<br>The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | Matter is unlikely to be agreed as it would be delivered outside the development consent process |
| 3.15.4 – Removal of obsolete pylons | ECC welcomes the proposal to remove a number of 132 kV pylon lines and would encourage the Applicant to explore opportunities for further 132 kV removal.<br>The Applicant requests ECC provides specific 132 kV lines for removal, with justification, for consideration. | Resolution likely by Deadline 7. |
| 3.15.5 – Airfields | ECC reserves its position on airfields regarding confirmation of the impact on future use of airfields across the county.<br>The Applicant's position on airfield safety and security is provided Section 3.17 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | Resolution likely by Deadline 7. |
| **Ecology and Biodiversity** | | |
| 3.3.6 – Key parameters and assumptions | ECC recommends replacement planting failure percentage should be factored into the compensation requirement. The Applicant confirms a commitment to a 5-year aftercare period for all replacement tree and hedgerow planting and a 30-year aftercare period at Environmental Areas. ECC is reviewing sections relating to habitat reinstatement and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.3.11 – Construction effects<br>3.3.18 – Data sources (bats)<br>3.3.19 – Survey methodology | ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation. ECC requests further information regarding the baseline conditions and receptors and standard mitigation for roosting bats. | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| (bats)<br>3.3.20 – Baseline conditions and receptors (bats)<br>3.3.21 – Standard mitigation (bats) | The Applicant has provided further clarification on the bat survey scope and notes Natural England's agreement with the bat roost survey scope. | |
| 3.3.13 – Outline CoCP | ECC remains unconvinced that the **7.2 Outline Code of Construction Practice [REP3-025]** provides adequate guarantees of ECoW competence or capacity.<br>The Applicant maintains that this role will not be undertaken by one individual, but by multiple ecologists with a range of relevant experience and any protected species licences necessary for the specific task to be undertaken. Further details on the number and type of ECoWs required across the Project will be included within the Final Landscape and Ecological Management Plan (post-DCO consent). | Matter unlikely to be agreed during Examination. |
| 3.3.14 – Outline LEMP | The Applicant has provided further clarification regarding the criteria used for defining a tree's bat hibernation potential and notes that all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed. | Resolution likely by Deadline 7. |
| 3.3.15 – Biodiversity Net Gain – onsite and assessment | ECC would like this matter to remain Under Discussion until the matter relating to replacement tree and hedgerow planting is resolved. | Resolution likely by Deadline 7. |
| 3.3.16 – Biodiversity Net Gain - offsite | ECC is seeking further clarification regarding offsite BNG. The Applicant notes that this will be secured by legal agreement and delivered through collaboration with partners and purchased from commercially registered providers. | Resolution likely by Deadline 7. |
| 3.3.17 – Arboriculture Impact Assessment | ECC is reviewing sections relating to the Arboriculture Impact Assessment and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| **Green Infrastructure** | | |
| 3.4.1 - Data sources (ecology matters) | ECC maintain that The Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study. The Applicant maintains that | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | sufficient data informs the assessment and will consider the Recovery Strategy as part of the off-site BNG selection process. | |
| 3.4.2 - Standard mitigation<br>3.4.3 - Additional mitigation | ECC requests GI principles are integrated into the mitigation hierarchy. ECC state that GI delivery should be explicitly aligned with the Essex GI Strategy. The Applicant confirms the commitment to achieving wider strategic outcomes at the local level through BNG commitments. ECC is reviewing sections relating to the GI mitigation and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.4.4 - Outline LEMP | ECC requests clarity on long-term monitoring for BNG delivery. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas. Detail on habitat management and monitoring will be set out in the final Landscape and Ecological Management Plan post consent. ECC is reviewing sections relating to the habitat monitoring and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.4.5 - Biodiversity Net Gain<br>3.4.8 - Outline LEMP (landscape and visual) | ECC recommend that more than 10% BNG is delivered, and to ensure delivery is in line with the Essex LNRS. Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions. ECC is concerned about double-counting between mitigation, enhancement, and compensation. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites. ECC is reviewing sections relating to the BNG and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.4.6 - Embedded mitigation (landscape and visual) | ECC requests GI is used as a component of landscape mitigation and is aligned with LNRS strategies. ECC is reviewing sections relating to GI and will provide the Applicant with an update once complete. The Applicant will liaise with ECC once feedback is received | Resolution likely by Deadline 7. |
| 3.4.7 - Additional mitigation (landscape and visual) | Discussion ongoing regarding compensation measures and offsite BNG provision. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent. | Matter unlikely to be agreed during Examination, as this is a post-consent matter. |
| **Contaminated Land, Geology and Hydrogeology** | | |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.5.3 – Operational (and maintenance) effects | Further discussion is required regarding safeguarding of mineral deposits and the MWPA's call for sites for the emergying Essex Minerals Local Plan | Resolution likely by Deadline 7. |
| **Health and Wellbeing** | | |
| 3.6.5 – Key parameters and assumptions | ECC recommends the health assessment is updated to consider the October 2025 IMD data and address changes to vulnerable and sensitive receptors. The Applicants confirms that following a review of the updated IMD data published in October 2025, it is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment. | Resolution likely by Deadline 7. |
| 3.6.7 – Embedded mitigation<br>3.6.8 – Standard mitigation<br>3.6.9 – Additional mitigation | ECC recommends that consideration is given to the mitigation proposed, including the exploration of establishing of a Health and Wellbeing Monitoring Framework. The Applicant confirms that they will continue to engage with people potentially affected during the lifecycle of the Project. | Resolution likely by Deadline 7. |
| **Historic Environment** | | |
| 3.7.14b – Standard mitigation (built heritage) | ECC recommend expansion of commitment H07 in the **7.2 Outline Code of Construction Practice [REP3-025]**. ECC is concerned that the **7.2 Outline Code of Construction Practice [REP3-025]** does not include mitigation proposals for impacts to built heritage during the construction phase. | Resolution likely by Deadline 7. |
| 3.7.16 – Additional mitigation<br>3.7.25 - Outline Archaeological Mitigation Strategy and Outline WSI | ECC note that the effectiveness of additional mitigation will depend on **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Applicant is currently preparing an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** scheduled for submission at Deadline 5. | Resolution likely by Deadline 7. |
| **Hydrology, Land Drainage and Flood Risk** | | |
| 3.8.1 – Policy and legislation<br>3.8.8 – Standard mitigation<br>3.8.9 – Additional mitigation | ECC request further information on proposals for surface water management and storage calculations. The Applicant confirms that further information on this regard has been submitted as part of **8.2 Drainage Strategy [REP1-072]** at Deadline 1. ECC is reviewing the **8.2 Drainage Strategy [REP1-072]** and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.8.3 – Data sources<br>3.8.5 – Key parameters and assumptions<br>3.8.6 – Baseline conditions and receptors<br>3.8.7 – Embedded mitigation<br>3.8.11 – Operational (and maintenance) effects<br>3.8.13 – Flood Risk Assessment | ECC is concerned about flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation. The Applicant confirms that commitment W08 within **7.2 Outline Code of Construction Practice [REP3-025]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs. | Resolution likely by Deadline 7. |
| 3.8.10 – Construction effects<br>3.8.12 – Outline CoCP (including Flood Warning and Evacuation Plan) | ECC refer to their comments in the Relevant Representations that surface water runoff from permanent and temporary built-up areas should be managed on site. The Applicant confirms that further detail on this regard has been submitted as part of **8.2 Drainage Strategy [REP1-072]** at Deadline 1. | Resolution likely by Deadline 7. |
| **Landscape and Visual** | | |
| 3.9.1 – Policy and legislation | ECC is concerned that the some of the evaluation of valued landscapes is flawed, and the judgement on significance. ECC to review **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for the Applicant's position on landscape mitigation and compensation. | Matter is unlikely to be agreed during Examination. |
| 3.9.2 – Study area | Generally ECC do not have issues with the study area, however, in relation to the visual assessment ECC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding. The Applicant maintains that the study area has been agreed through Scoping and subsequent thematic workshops. | Resolution likely by Deadline 7. |
| 3.9.3 – Data sources | ECC is concerned about gaps in viewpoint distribution and with the approach to landscape value and value of the view. ECC also requests improvements to presentation to improve access and interpretation.<br>The Applicant states that the request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints** | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | **[APP-243]** was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure. | |
| 3.9.4 – Assessment methodology (including LVIA methodology) | ECC remains concerned that there are gaps in viewpoint coverage. ECC is reviewing the Applicant's responses on the approach to landscape value and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.9.4a – Assessment methodology (viewpoints) | ECC remains concerned that there are gaps in viewpoint coverage. The Applicant confirms the approach to selecting viewpoints is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape** and **Visual Methodology [APP-227].** The Applicant states that the number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone. | Matter is unlikely to be agreed during Examination. |
| 3.9.5 – Key parameters and assumptions | ECC not sure what is meant by the terms key parameters and assumptions. The Applicant maintains that the key parameters and assumptions presented are considered appropriate. | Resolution likely by Deadline 7. |
| 3.9.6 – Baseline conditions and receptors | ECC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. ECC retain these concerns.<br>The Applicant maintains the baseline conditions and receptors presented are appropriate. | Matter is unlikely to be agreed during Examination. |
| 3.9.7 – Embedded mitigation | ECC is concerned around the adequacy of undergrounding, mitigation and lack of compensation. The Applicant reiterates that the embedded mitigation proposed is considered appropriate. | Matter is unlikely to be agreed during Examination. |
| 3.9.8 – Standard mitigation<br>3.9.9 – Additional mitigation | ECC is concerned that standard mitigation proposed does not address residual landscape effects or compensation. The Applicant reiterates that the standard mitigation proposed is considered appropriate. | Matter is unlikely to be agreed during Examination. |
| 3.9.10 – Construction effects | ECC is concerned that the potential tree and hedgerow loss has not been meaningfully quantified in relation to landscape and visual. The Applicant refers to | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | the vegetation loss assessment is set out in **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [APP-048].** | |
| 3.9.11 – Operational (and maintenance) effects | ECC request the consideration of further re-routing and undergrounding to reduce significant landscape and visual effects. The Applicant confirms that the approach to the LVIA follows professional guidance and was discussed with stakeholders. It is considered that the judgements made as part of the assessments remain fair and reasonable. | Matter is unlikely to be agreed during Examination. |
| 3.9.12 – Outline CoCP | ECC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.9.13 – Outline LEMP | ECC retain concerns in relation to definition, scope and scale of term 'compensation'. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations.<br>The Applicant maintains that all relevant measures are appropriate. | Matter is unlikely to be agreed during Examination. |
| 3.9.14 – Cumulative effects | ECC is concerned regarding cumulative adverse landscape and visual effects at construction and operational phases. The Applicant confirms that the cumulative assessment will be updated and published at Deadline 4 to include Five Estuaries, North Falls, the Tarchon Interconnector Project and any other newly identified schemes in the area around Ardleigh and along the rest of the Project. | Resolution likely by Deadline 7. |
| **Socio-economics, Recreation and Tourism** | | |
| 3.10.1 – Policy and legislation<br>3.10.3 – Data sources<br>3.10.5 – Key parameters and assumptions<br>3.10.8 – Standard mitigation<br>3.10.9 – Additional mitigation | ECC recommends to prepare an Employment and Skills Strategy and requests detailed labour market demand data and targeted upskilling. The Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. The Applicant also confirms continued engagement to deliver long-lasting community benefits. | Resolution likely by Deadline 7. |
| 3.10.4 – Assessment methodology | ECC request that businesses outside of the study area that will be impacted to be considered on a case-by-case basis.<br>The Applicant maintains that businesses where visual impact would be likely to | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | be an economic consideration, that beyond the 3km study area were not considered likely to have significant adverse effects. | |
| 3.10.6 – Baseline conditions and receptors | ECC to review the section on baseline conditions and receptors and provide the Applicant with an update once complete. | Resolution likely by Deadline 7. |
| 3.10.7 – Embedded mitigation<br>3.10.8 – Standard mitigation<br>3.10.9 – Additional mitigation | ECC requests that skills and community benefits should be considered separately. The Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5. | Resolution likely at Deadline 5. |
| 3.10.10 – Construction effects<br>3.10.11 – Operational (and maintenance) effects | ECC position pending. | Deadline for resolution pending ECC position |
| 3.10.12 – Outline CoCP | ECC position pending. | Deadline for resolution pending ECC position |
| 3.10.13 – Skills and training | ECC requests additional clarification on skills and training. ECC requests opportunities for upskilling Essex residents are considered and the recommendation of an Employment and Skills Fund.<br>The Applicant does not consider that the establishment of an Employment and Skills Fund is appropriate, necessary, or proportionate for this Project. However, the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. | Resolution likely by Deadline 7. |
| 3.10.14 – Cumulative effects | ECC raises concerns on the risk of cumulative disruption of the local economy.<br>The Applicant is committed to supporting skills development and workforce planning at both local and regional levels. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement. | Matter is unlikely to be agreed during Examination. |
| **Traffic and Transport** | | |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.11.3 – Data sources | Additional traffic data, modelling, traffic flows and technical note to be provided for ECC to review. | Resolution likely by Deadline 4. |
| 3.11.5 - Key parameters and assumptions | ECC review of traffic assumptions (such as workers arrival/departure times, car occupancy rates) to continue until monitoring, management and mitigation is agreed | Resolution likely by Deadline 4. |
| 3.11.6 - Key parameters and assumptions | ECC queried impacts on local roads due to road crossings. | Resolution likely by Deadline 4. |
| 3.11.7 - Key parameters and assumptions | ECC queried HGV arrival/departure times on sensitive routes, such as specific highway junctions/links or routes near schools. The Applicant has outlined the expected Project construction traffic at these locations. | Resolution likely by Deadline 4. |
| 3.11.8 - Key parameters and assumptions | ECC have sought further discussion on collision clusters. The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.9 - Key parameters and assumptions | ECC queried assessment of parking impacts. The Applicant has outlined the case-by-case assessment of parking impacts and will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.10 - Key parameters and assumptions | ECC queried identification of sensitive receptors near schools. The Applicant has considered impacts adjacent to schools, considers the proposed mitigation appropriate, and will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.11 - Key parameters and assumptions | ECC queried assessment criteria and use of IEMA guidelines. The Applicant confirms its use of IEMA guidelines in its assessments and will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.12 - Key parameters and assumptions | ECC has accepted the figures in the trip generation, subject to the numbers being monitored and managed with mitigation. The Applicant is continuing engagement with ECC to agree the monitoring, management and mitigation measures. | Resolution likely by Deadline 4. |
| 3.11.13 - Baseline conditions and receptors | Further discussions are ongoing with ECC regarding school activity, personal injury clusters, PRoW and pedestrian routes on narrow footways on PARs, as well as pinch points/traffic calming. | Resolution likely by Deadline 4. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.11.15 - Embedded mitigation | The Applicant will continue to liaise with ECC on construction worker travel. | Resolution likely by Deadline 4. |
| 3.11.16 - Embedded mitigation | The Applicant is engaging with ECC on the subject of emergency callouts that could reasonably be attributed to the Project. | Resolution likely by Deadline 4. |
| 3.11.17 - Embedded mitigation | ECC requested further detail on shift patterns, working hours, and how these will be managed. The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.18 - Embedded mitigation | ECC has sought commitment to reducing freight by road. The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4. |
| 3.11.19 - Embedded mitigation | The monitoring, management and mitigation of construction vehicles numbers is Under Discussion between ECC and the Applicant. | Resolution likely by Deadline 4. |
| 3.11.20 - Embedded mitigation | ECC has sought wider commitment to engaging with the public. The Applicant will continue to discuss this with ECC. | Resolution likely by Deadline 4. |
| 3.11.21 – Standard mitigation | The Applicant will continue to liaise with ECC in relation to standard mitigation(s). | Resolution likely by Deadline 4. |
| 3.11.22 - Additional mitigation | The Applicant will continue to liaise with ECC in relation to PRoWs that link onto, or cross PARs, narrow footways on PARs, road safety issues on PARs, crossing facilities and pinch points. | Resolution likely by Deadline 4. |
| 3.11.23 - Additional mitigation<br>3.11.24 - Additional mitigation | The Applicant will continue to liaise with ECC in relation to additional mitigation at junctions and construction traffic restrictions proposed in the vicinity of schools. | Resolution likely by Deadline 4. |
| 3.11.25 and 3.11.26 - Construction effects - WCH | The Applicant will continue to liaise with ECC in relation to construction effects on all PRoW users along the construction route and on schools. | Resolution likely by Deadline 4. |
| 3.11.27 - Construction effects – Spa Road | The Applicant will continue to liaise with ECC in relation to the evaluation of construction effects and accommodating HGV movements on Spa Road, Witham. | Resolution likely by Deadline 4. |
| 3.11.29 - Construction effects - PRoW | The Applicant will continue to liaise with ECC on potential PRoW mitigation at certain locations. | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.11.30 - Construction effects – bus passenger delay | The Applicant will continue to liaise with ECC in relation to construction effects on bus passenger delay (including school buses). | Resolution likely by Deadline 7. |
| 3.11.31a – EIA - Construction effects – fear and intimidation | The Applicant will continue to liaise with ECC in relation to fear and intimidation on PARs. | Resolution likely by Deadline 7 |
| 3.11.31b – EIA - Construction effects - impacts outside of peak activity | The Applicant will continue to liaise with ECC in relation to construction impacts outside of peak activity. | Resolution likely by Deadline 7 |
| 3.11.32 - Outline CoCP | The Applicant will continue to liaise with ECC on this matter which ECC have related to embedded, standard and additional mitigation measures for Socio-economic, Recreation and Tourism effects. | Resolution likely by Deadline 7. |
| 3.11.37 - Assessment of WCH | The Applicant will continue to liaise with ECC in relation to construction effects on all PRoW users along the construction route (for the Assessment of WCH). | Resolution likely by Deadline 7. |
| 3.11.38 - Impact on Parking | ECC and the Applicant will continue to liaise in relation to parking impacts, and street parking restriction. | Resolution likely by Deadline 7. |
| 3.11.39 - Existing road side facilities (parking) | The Applicant will continue to liaise with ECC in relation to detail on the parking provision for construction worker vehicles (including monitoring and management). | Resolution likely by Deadline 7. |
| 3.11.41 - Impact on Parking | The Applicant will continue to liaise with ECC in relation to the impact on existing HGV driver facilities and measures. | Resolution likely by Deadline 4. |
| 3.11.42 - Road Safety | ECC and the Applicant will maintain ongoing discussions in relation to road safety improvements along the PARs. | Resolution likely by Deadline 7. |
| 3.11.44a to 3.11.44g – Transport Assessment - Mitigation Measures | The Applicant will continue to liaise with ECC on these matters. | Resolution likely by Deadline 7. |
| 3.11.45 - Baseline conditions<br>3.11.46 - Baseline conditions | The Applicant will continue to liaise with ECC in relation to baseline conditions and sensitive receptors, and existing HGV driver facilities. | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| 3.11.48 - Cumulative Developments | Review of committed developments (including the list of committed developments provided by ECC to the Applicant). The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 4 |
| 3.11.49 - Key Assumptions | The Applicant will continue to liaise with ECC in relation to key assumptions within the TA on this matter | Resolution likely by Deadline 7. |
| 3.11.50 – Methodology<br>3.11.51 – Construction Vehicle Trips<br>3.11.52 – Construction Workforce Trips | The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with respect to the methodology of the Trip Generation). | Resolution likely by Deadline 4. |
| 3.11.53 - Overall impact of the project | The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with respect to the conclusion of the Transport Assessment). | Resolution likely by Deadline 4. |
| 3.11.55 - Pre-and Post Construction Surveys | The Applicant will continue to liaise with ECC in relation to pre-and post-construction surveys and maintenance liability for local highway network. | Resolution likely by Deadline 4. |
| 3.11.57 - Traffic Management Measures | The Applicant will continue to liaise with ECC in relation to the commitment to hold discussions with bus operators that are affected (particularly school buses) by routes that are diverted (regardless of duration) to minimise impacts. | Resolution likely by Deadline 7. |
| 3.11.58 - Implementation/ Enforcement | The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with to the implementation and enforcement process set out in CTMP). | Resolution likely by Deadline 4. |
| 3.11.59 –Implementation/Enforcement | The Applicant will continue to liaise with ECC in relation to requested clarification on the communication strategy to the wider public (with respect to AIL movements) and engagement with the Developers Forum. | Resolution likely by Deadline 4. |
| 3.11.60 - Policy | The Applicant will continue to liaise with ECC in relation to inclusion of baseline figures (as part of the targets set out in the CWTP). | Resolution likely by Deadline 7. |
| 3.11.62 - Targets, Strategy, | ECC has requested a commitment to the provision of mini buses. The Applicant will continue to discuss this with Main Works Contractor(s) and ECC once more | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| and Measures | details are known about the location of construction staff at the next stage of design. | |
| 3.11.63 - Targets, Strategy, and Measures | ECC has requested The Applicant provides clarification on parking provision and management and interventions proposed by the Applicant in the CTMP. The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 7. |
| 3.11.64 – Targets, Strategy and Measures | The Application will continue to liaise with ECC in relation to the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the final CWTP). | Resolution likely by Deadline 7. |
| 3.11.65 - Monitoring and Review | The Applicant will continue to liaise with ECC in relation to the Monitoring and Review process described in the CWTP. | Resolution likely by Deadline 4. |
| 3.11.67 - Primary Access Route Selection | The Applicant will continue to liaise with ECC in relation to highway mitigation proposals (on PARs). | Resolution likely by Deadline 7. |
| 3.11.68 - Construction Access and Crossover Design | The Applicant will continue to liaise with ECC in relation to proposed site access and crossover points. | Resolution likely by Deadline 7. |
| 3.11.69 - Highway Mitigation Design | The Applicant will continue to liaise with ECC in relation to highway mitigation proposals. ECC to respond after review of Designer's Response to be submitted by the Applicant (including works outside of the Public Highway, categorised as 'Red' in the CTMP). | Resolution likely by Deadline 7. |
| 3.11.72 to 3.11.76 – Traffic Regulation Orders and Temporary Traffic Regulation Orders | The Applicant will continue to liaise with ECC in relation to ECC's general request for more information on the TROs. | Resolution likely by Deadline 7. |
| 3.11.77 - Traffic Regulation Orders and Temporary Traffic Regulation Orders | ECC seeking confirmation of checks done on diversion routes for proposed TROs(structural, width, height and environmental restrictions). The Applicant will continue to liaise with ECC on this matter. | Resolution likely by Deadline 7. |
| 3.11.78 and 3.11.79 - Traffic Regulation Orders and | ECC request for further reviews of road closure diversion routes in advance of road closures and a mechanism for any scope changes to diversion routes. The | Resolution likely by Deadline 7. |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| Temporary Traffic Regulation Orders | Applicant will continue to liaise with ECC on these matters. | |
| 3.11.84 - Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road | The Applicant will continue to liaise with ECC in relation to ECC concerns on the highway mitigation proposal for Ardleigh Road / Bentley Road. | Resolution likely by Deadline 7. |
| 3.11.86 - Abnormal Indivisible Load (AIL) Access Routes | The Applicant will continue to liaise with ECC in relation to structural investigations for AIL movements and AIL tracking drawings. | Resolution likely by Deadline 7. |
| 3.11.88 - Abnormal Indivisible Load (AIL) Structural Investigations | The Applicant will continue to liaise with ECC in relation to structural assessments along the selected AIL routes that are to be completed by the Contractor. | Resolution likely by Deadline 7. |
| 3.11.89 and 3.11.90 - Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The Applicant will continue to liaise with ECC in relation to road safety audits that involve proposed AIL movements and if a Road Safety Audit at Beaulieu Parkway Roundabout is suitable. | Resolution likely by Deadline 7. |
| 3.11.91 - Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The Applicant will continue to liaise with ECC in relation to providing clarification of the communication strategy for AIL movements, including for informing the wider public. | Resolution likely by Deadline 4. |
| 3.11.93 – Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The Applicant will continue to liaise with ECC in relation to potential cost recovery through a Planning Performance Agreement (PPA) | Resolution likely by Deadline 7 |
| **Public Rights of Way (PRoW)** | | |
| 3.12.3 - Proposed Management Regime Approach | The Applicant will continue to liaise with ECC in relation to PRoW should they be identified to be permanently stopped-up, and consult with ECC to agree the appropriate mitigation. | Resolution likely by Deadline 4. |
| 3.12.5 – Proposed Management Regime Approach (vegetation | The Applicant will continue to liaise with ECC in relation to vegetation clearance of existing footways and maintenance of verges. | Resolution likely by Deadline 7 |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| clearance) | | |
| **Cumulative Effects** | | |
| 3.13.1 – Policy and Legislation | ECC requests a Developer's Forum with key members of NSIPs, including North Falls, Five Estuaries and Lower Thames Crossing, and further detail on construction programme for this engagement. The Applicant confirms that the NSIPs mentioned have been considered as part of the cumulative effects assessment, and engagement is ongoing with these project teams. | Resolution likely by Deadline 7 |
| 3.13.7 – Embedded mitigation<br>3.13.8 – Standard mitigation<br>3.13.9 – Additional mitigation | ECC requests further discussions to ensure mitigation is agreed and secured appropriately. The Applicant considers that all mitigation is appropriate and will be secured through the DCO. | Resolution likely by Deadline 7 |
| 3.13.10 – Construction effects<br>3.13.11 – Operational (and maintenance) effects | ECC is concerned about the cumulative noise impacts, and adverse effects on communities and the environment, with consideration for the proposed construction working hours. ECC is also concerned that the Project would lead to significant landscape change across Essex. ECC also sets out its concerns in relation to construction traffic. | Matter unlikely to be agreed during Examination. |
| 3.13.12 – Outline CoCP | ECC is reviewing the updated **7.2 Outline Code of Construction Practice [ REP3-025]** and will provide the Applicant with an update once complete. | Resolution likely by Deadline 7 |
| 3.13.13 – Cumulative impacts | ECC is concerned over the cumulative effects of NSIPs proposed, and the Tarchon Interconnector. The Applicant confirms that Tarchon Interconnector is being considered in the updated cumulative effects assessment, which will be submitted during examination. | Resolution likely by Deadline 7 |
| **Development Consent Order** | | |
| 3.14.1 – Interpretation | ECC would like the definition of reinstatement planting to distinguish between replacement planting and what constitutes mitigation and compensation planting. The Applicant does not agree. | This matter is unlikely to be resolved. |
| 3.14.2 –Stages of authorized development | ECC seeks consistent use of "business days," clarity on notice periods, and for submissions to be subject to approval rather than notification. | Resolution of this matter is anticipated by |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | The Applicant has updated the Draft DCO to use “business days” and adjusted time periods accordingly. The Applicant does not agree that submissions should be subject to approval rather than notification. | Deadline 7. |
| 3.14.3 – Construction environmental management plans | ECC seeks justification for the absence of a CEMP, clarification that the Outline Code of Construction Practice and its appendices provide equivalent controls, and inclusion of additional consultees.<br>The Applicant considers that the Outline Code of Construction Practice and appended plans provide the necessary controls and are secured through Requirement 4. The Applicant will continue to liaise with ECC on the inclusion of additional consultees where necessary. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.4 – Design and layout plans | ECC is concerned that the use of “general accordance” and the limits of deviation allow too much subjectivity and flexibility, potentially resulting in materially different environmental effects.<br>The Applicant considers the approach appropriate and that further restrictions to the limits of deviation are not necessary. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.5 – Construction hours | ECC seeks clarification on the scope and potential impacts of “start-up and close-down activities” and their potential to generate noise disturbance.<br>The Applicant considers these activities to be low impact, subject to best practicable means and mitigation, with controls secured through the Outline Code of Construction Practice. The Applicant will continue to liaise with ECC on this matter. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.6 – Reinstatement schemes | ECC seeks clarity on the meaning of “former use” and how reinstatement will apply, including within the 10m cable corridor.<br>The Applicant has amended the Draft DCO to refer to “former condition” accordingly and notes that restrictions on reinstatement within 10m of cables are necessary for operational and safety reasons. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.7 – Decommissioning | ECC seeks further detail on decommissioning impacts and outcomes.<br>The Applicant considers decommissioning activities not reasonably foreseeable, and therefore these have been scoped out of the Environmental Statement. The | Resolution of this matter is anticipated by Deadline 4 |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | Applicant notes that all appropriate consents would be sought at the relevant time. | |
| 3.14.8 – Applications made under requirements | ECC considers the proposed decision-making timescales for discharge of requirements too short and requests an extension to at least 56 days. ECC also seeks clarification on when the determination period recommences following submission of further information.<br>The Applicant has revised the proposed period to 25 business days (equivalent to 35 days) and considers this proportionate and necessary to avoid project delays. The Applicant notes that this period can be extended by agreement in writing where required. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.9 – Further information | ECC considers the proposed timeframes for requesting further information too short and seeks longer periods for requesting further information and undertaking consultation.<br>The Applicant has amended the Draft DCO to refer to “five business days” for consistency of terminology and considers five business days to be proportionate given the Project’s status of critical national importance. The Applicant notes that requests for further information can still be made after the five business day period with agreement where necessary. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.10 – Fees | ECC is considering the appropriate fee level and seeks longer determination and refund periods, retention of a proportion of fees, and clarification on index linking.<br>The Applicant has amended the Draft DCO to align fees with the national schedule for discharge of conditions. The Applicant consider retention or index linking is not appropriate, and proposes post-consent PPAs to address cost recovery. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.11 – Certified documents | ECC considers stronger controls are required and seeks certification of relevant documents and clearer provision for managing flood risk and drainage.<br>The Applicant considers that adequate controls are already secured through the Outline Code of Construction Practice. The Applicant will continue to liaise with ECC on this matter. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.12 – Register of | ECC requests that a register of requirements should be maintained by the | Resolution of this matter |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| requirements | Applicant.<br>The Applicant considers this unnecessary and disproportionate and notes that each authority can maintain its own register. | is anticipated by Deadline 7. |
| 3.14.13 – Post-consent programme of ecological mitigation | ECC considers that a BNG delivery plan and ecological mitigation measures should be secured through a DCO Requirement.<br>The Applicant proposes to secure at least 10% BNG through a unilateral undertaking and does not consider additional Requirements necessary. The Applicant will continue to liaise with ECC on this matter. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.14 – Developer's forum | ECC requests the establishment of a Developers Forum to coordinate and manage cumulative effects.<br>The Applicant will continue to liaise with ECC on this matter. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.15 – HGV parking | ECC considers that surveys and mitigation for HGV parking should be secured prior to commencement of works, potentially through a requirement or management plan.<br>The Applicant considers that these matters are addressed within the Outline Construction Traffic Management Plan and will continue to liaise with ECC on this matter. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.16 – Employment and skills plan | ECC SCC seeks an employment and skills plan to be submitted for approval.<br>The Applicant is preparing an Employment and Skills Plan for submission at Deadline 5. Implementation of this plan will be secured by a new DCO Requirement. | Resolution of this matter is anticipated by Deadline 5. |
| 3.14.17 – Health and Wellbeing mitigation and monitoring plan | ECC considers that a dedicated strategy and monitoring plan should be secured through the DCO.<br>The Applicant considers that appropriate mitigation is already secured through Requirement 7 and that no monitoring is required as no significant health and wellbeing effects have been identified. | Resolution of this matter is anticipated by Deadline 7. |
| 3.14.18 – Green infrastructure strategy | ECC seeks an additional requirement for a Green Infrastructure Strategy to align measures across documents and ensure delivery of enhancements through | Resolution of this matter is anticipated by |

| SoCG ID | Summary of matter Under Discussion | Deadline for resolution |
|---|---|---|
| | detailed design.<br>The Applicant supports environmental net gain and notes that monitoring and delivery are already secured through the Biodiversity Net Gain Report and Outline Landscape and Ecological Management Plan, but will consider opportunities for further enhancement. | Deadline 7. |
| 3.14.19 –Submissions for discharge requirements | ECC seeks assurance that submissions will meet an agreed quality standard to enable efficient processing.<br>The Applicant considers this is already addressed through Requirement 4, which requires submissions to be in substantial accordance with the approved outline management plans. | Deadline 4 |
| 3.14.20 - DCO Wording | Discussions are ongoing in relation to detailed drafting points on:<br>• Decision-making and approval timescales;<br>• Definition of 'maintain';<br>• Definition of 'provisional advance authorisation';<br>• Limits of deviation;<br>• Application of permit schemes;<br>• Discharge of water;<br>• Traffic regulation;<br>• Felling or lopping;<br>• Safeguarding;<br>• Service of notices;<br>• Draft protective provisions; and<br>• Certified documents. | Deadline 7 |

## 1.3 ~~1.2~~ Project Description

1.3.1 ~~1.2.1~~ The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

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

1.3.2 ~~1.2.2~~ In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.3.3 ~~1.2.3~~ As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.3.4 ~~1.2.4~~ The Project will be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met

when designing, constructing and operating assets such as those proposed for the Project.

## 1.4 ~~1.3~~ Format and Structure of this Document

1.4.1 ~~1.3.1~~ This SoCG is structured as follows:

- **Section ~~2~~2** provides a summary of the key engagement undertaken to date with ECC
- **Section ~~3~~3** summarises the key matters and captures the status of each issue / matter
- **Section ~~4~~4** includes the sign off sheet

# 2. Record of Key Engagement

## 2.1 Introduction

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

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

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

## 2.2 Summary of Key Engagement

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

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

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

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

| Date | Format | Topic/Description |
|---|---|---|
| | Correspondence | Outline CoCP |
| January 2025 | Email Correspondence | National Grid issued the draft Statement of Common Ground (SoCG) |
| March 2025 | Meeting | Meeting to discuss the second iteration of the Outline COCP and Outline LEMP |
| March 2025 | Meeting | All host authority workshop |
| May 2025 | Email Correspondence | National Grid issued an updated iteration of the draft CoCP |
| May 2025 | Email Correspondence | National Grid issued a new appendix to the draft Outline CoCP - Appendix H, Draft Greenhouse Gas Reduction Strategy |
| May 2025 | Email Correspondence | National Grid issued the Long List of Other Developments |
| May 2025 | Meeting | Meeting to discuss targeted consultation feedback |
| May 2025 | Meeting | Meeting to discuss duty to further the purposes of the National Landscape |
| May 2025 | Meeting | All host authority workshop |
| June 2025 | Meeting | Meeting to discuss access arrangements around Dunton Hills Garden Village |
| June 2025 | Email Correspondence | National Grid issued draft DCO, explanatory memorandum and draft requirements |
| July 2025 | Meeting | All host authority workshop |
| August 2025 | Email Correspondence | National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision |
| August 2025 | Meeting | Meeting to provide project and design update |
| September 2025 | Meeting | All host authority workshop |
| November 2025 | Email | ECC shared their relevant representations with National Grid following submission to PINS. |
| November 2025 | Meeting | All host authority workshop |
| December 2025 | Meeting | Meeting to discuss Statement of Common Ground |
| December 2025 | Meeting | Meeting to discuss change application |
| January 2026 | Meeting | All host authority workshop |
| February 2026 | Meeting | Meeting to progress Statement of Common Ground |
| March 2026 | Email | Email to agree approach for Statement of Common Ground Deadline 4 submission |

| Date | Format | Topic/Description |
|---|---|---|
| March 2026 | Meeting | Meeting to confirm approach for Statement of Common Ground for deadline 4 submission |
| March 2026 | Meeting | Meeting to discuss Dunton Hills Garden Village |
| March 2026 | Meeting | All host authority workshop |
| **Ecology and Biodiversity** | | |
| July 2022 | Email Correspondence | National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting. |
| July 2022 | Meeting | Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from ECC and other authorities. |
| September 2023 | Meeting | National Grid discussed the potential off-site scheme/initiatives for BNG. |
| January 2024 | Meeting | Meeting to discuss the BNG initiative. |
| March 2024 | Meeting | Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England. |
| May 2024 | Technical Note | National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. |
| May 2024 | Meeting | Optional Thematic Group call. |
| September 2024 | Email Correspondence | National Grid shared the Outline Landscape and Ecological Management Plan (oLEMP) |
| October 2024 | Meeting | National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP. |
| January 2025 | Meeting | National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England |
| January 2025 | Meeting | National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report |
| January 2025 | Email Correspondence | National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP) |
| January 2025 | Email Correspondence | National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment |

| Date | Format | Topic/Description |
|---|---|---|
| January 2025 | Email Correspondence | National Grid issued the Biodiversity Net Gain Assessment Strategy |
| March 2025 | Email Correspondence | National Grid issued the draft Arboriculture Impact Assessment (AIA) |
| April 2025 | Meeting | Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England. |
| May 2025 | Meeting | Meeting to discuss the updated Proposed Protected Species Mitigation document |
| May 2025 | Email Correspondence | National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP) |
| May 2025 | Email Correspondence | National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals |
| September 2025 | Meeting | Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex South) |
| September 2025 | Meeting | Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex North) |
| January 2026 | Meeting | Meeting to discuss Statement of Common Ground with ECC |
| **Contaminated Land, Geology and Hydrogeology** | | |
| August 2022 | Email Correspondence | National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities. |
| September 2023 | Email Correspondence | National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA). |
| **Health and Wellbeing (including Air Quality and Noise and Vibration)** | | |
| September 2022 | Email Correspondence | National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities. |
| September 2022 | Email Correspondence | National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment. |
| September 2022 | Email Correspondence | National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment. |
| July 2023 | Technical Note | National Grid issued a technical note to Environmental Health Officers (EHOs) to agree the |

| Date | Format | Topic/Description |
|---|---|---|
| | | approach to the operational noise impact assessment of the proposed EACN Substation. |
| September 2023 | Technical Note | National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology. |
| September 2024 | Meeting | National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES. |
| October 2024 | Technical note | National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology. |
| October 2025 | Meeting | Optional thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement. |
| **Historic Environment** | | |
| July 2022 | Email Correspondence | National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England. |
| July 2022 | Meeting | Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment. |
| September 2022 | Meeting | National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received. |
| January 2023 | Email Correspondence | National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities. |
| February 2023 | Meeting | National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints. |
| June 2023 | Technical Note | National Grid issued a technical note to Historic England and host authorities (including Essex County Council) to agree methodology for the selection of viewpoints for the Historic Environment assessment. |
| September 2023 | Meeting | Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England. |

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

| Date | Format | Topic/Description |
|---|---|---|
| December 2024 | Meeting | Archaeology Working Group Meeting |
| December 2024 | Email Correspondence | National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching |
| January 2025 | Meeting | Archaeology Working Group Meeting |
| February 2025 | Email Correspondence | National Grid issued Historic Environment (HE) Viewpoints information |
| February 2025 | Meeting | Archaeology Working Group Meeting |
| February 2025 | Meeting | Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints |
| February 2025 | Email Correspondence | National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment |
| February 2025 | Email Correspondence | Meeting to discuss draft Heritage Baseline Report |
| March 2025 | Email Correspondence | National Grid issued updated Historic Environment Viewpoints information |
| March 2025 | Meeting | Archaeology Working Group Meeting |
| April 2025 | Email Correspondence | National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project |
| April 2025 | Meeting | Archaeology Working Group Meeting |
| May 2025 | Meeting | Technical focus meeting to discuss ongoing archaeology work on site |
| May 2025 | Meeting | Archaeology Working Group Meeting |
| June 2025 | Meeting | Archaeology Working Group Meeting |
| June 2025 | Email Correspondence | National Grid shared additional trench plans for Site 009, Areas 26 and 34 |
| June 2025 | Email Correspondence | National Grid shared updated trench plans for Site 009, areas 26 and 34 |
| June 2025 | Email Correspondence | National Grid share an Archaeological fieldwork summary for comment. |
| July 2025 | Meeting | Archaeology Working Group Meeting |
| August 2025 | Meeting | Archaeology Working Group Meeting |
| August 2025 | Email Correspondence | National Grid shared SSWSIs - Sites 011, 012, 013, 014 and 015 |

| Date | Format | Topic/Description |
|---|---|---|
| September 2025 | Meeting | Archaeology Working Group Meeting |
| August 2025 | Email Correspondence | National Grid shared SSWSIs - Sites 011 and 12 |
| September 2025 | Email Correspondence | National Grid shared updated SSWSIs sites 11 & 12 |
| October 2025 | Meeting | Archaeology Working Group Meeting |
| October 2025 | Meeting | Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex North) |
| October 2025 | Meeting | Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex South and Thurrock) |
| October 2025 | Email | National Grid shared the Trial Trench Plans for review and approval for site 009.011, and 15 |
| November 2025 | Meeting | Archaeology Working Group Meeting |
| November 2025 | Email | National Grid shapefile for the phase 2 survey along with the priority area survey |
| December 2025 | Meeting | Archaeology Working Group Meeting |
| December 2025 | Email | National Grid shared the WSI for the Phase 2 geophysical survey |
| January 2026 | Meeting | Archaeology Working Group Meeting |
| January 2026 | Meeting | Meeting to discuss the heritage aspects of the Statement of Common Ground. |
| January 2026 | Meeting | Meeting to discuss matters relating to built heritage in the Statement of Common Ground |
| January 2026 | Meeting | Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS. |
| February 2026 | Meeting | Archaeology Working Group Meeting |
| February 2026 | Meeting | National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders. |
| **Hydrology, Land Drainage and Flood Risk** | | |
| June 2022 | Email Correspondence | National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group. |
| July 2022 | Meeting | National Grid presented the EIA approach at the |

| Date | Format | Topic/Description |
|---|---|---|
| | | Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities. |
| May 2023 | Technical Note | National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA). |
| March 2024 | Technical Note | National Grid issued the Flood Risk Assessment Screening Report for comment. |
| September 2024 | Technical Note | National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note. |
| October 2024 | Meeting | National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project. |
| October 2024 | Meeting | Hydrology and Land Drainage Thematic Group Meeting |
| January 2025 | Email Correspondence | National Grid issued the Draft FRA for agreement/comment |
| January 2025 | Meeting | National Grid held a meeting to discuss comments raised from the draft FRA |
| March 2025 | Email Correspondence | National Grid issued Draft FRA for agreement/comment |
| **Landscape and Visual** | | |
| July 2022 | Meeting | Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review. |
| January 2023 | Email Correspondence | National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities. |
| February 2023 | Meeting | National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Essex. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES. ECC provided feedback on the viewpoints at the meeting and in subsequent correspondence. |
| April 2023 | Meeting | National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared. |
| May 2023 | Meeting | National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders |

| Date | Format | Topic/Description |
|---|---|---|
| | | provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence. |
| May 2023 – March 2024 | Email Correspondence | National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date). |
| August 2023 | Email Correspondence | National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment. |
| January 2024 | Email Correspondence | National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities. |
| May 2024 | Meeting | Optional Statutory Consultation Thematic Group call. |
| May 2024 | Meeting | EACN (Statutory Consultation) Thematic Group Meeting. |
| September 2024 | Email Correspondence | National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting. |
| September 2024 | Meeting | National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application. |
| September 2024 | Email Correspondence | National Grid shared the shapefiles for the landscape viewpoints and order limits with ECC and other stakeholders following the Landscape Thematic Group Meeting. |
| September 2024 | Email Correspondence | National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion. |
| September 2024 | Meeting | Landscape and Visual Thematic Group Meeting – LVIA Viewpoints within Essex North |
| October 2024 | Meeting | National Grid held a focus meeting to discuss the National Landscape. |
| October 2024 | Email Correspondence | National Grid shared the Draft mitigation drawings with stakeholders |
| October 2024 | Email Correspondence | National Grid shared the National landscape setting study with stakeholders |

| Date | Format | Topic/Description |
|---|---|---|
| October 2024 | Email Correspondence | National Grid shared updated viewpoint information data following from the landscape thematic workshops |
| December 2024 | Meeting | Meeting to agree photography locations and photomontages for the ES |
| March 2025 | Email Correspondence | National Grid issued an update on LVIA Viewpoints and Methodology |
| October 2025 | Meeting | Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex South) |
| October 2025 | Meeting | Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North) |
| October 2025 | Meeting | Follow up optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North) |
| January 2026 | Meeting | Joint meeting attended by LPA's who are represented by EPS for Landscape to discuss the Statement of Common Ground. |
| March 2026 | E-mail Correspondence | National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in ECC's Local Impact Report |
| **Socio-economics, Recreation and Tourism** | | |
| July 2022 | Email Correspondence | National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022. |
| July 2022 | Meeting | National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including ECC. |
| June 2023 | Technical Note | National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation. |
| August 2023 | Meeting | National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses. |

| Date | Format | Topic/Description |
|---|---|---|
| April 2024 | Technical Note | National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR. |
| September 2024 | Meeting | Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter. |
| September 2024 | Technical Note | National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders. |
| November 2024 | Meeting | National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter. |
| March 2025 | Email Correspondence | National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism. |
| September 2025 | Meeting | Optional thematic group meeting to discuss feedback on the Socio Economics, Recreation and Tourism section of the Environmental Statement (Covering Essex South) |
| **Traffic and Transport** | | |
| June 2022 | Technical Note | National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology. |
| July 2022 | Meeting | National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment. |
| September 2022 | Meeting | National Grid held a Local Highway Authority Thematic Group Meeting |
| December 2022 | Meeting | National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic. |
| June 2023 | Meeting | National Grid held a meeting to discuss the EACN Substation access arrangements with ECC and National Highways. |
| August 2023 | Meeting | National Grid held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology. |
| August 2023 | Meeting | Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce |

| Date | Format | Topic/Description |
|---|---|---|
| | | calculations. |
| September 2023 | Meeting | National Grid held a Transport Working Group Regional Meeting. |
| November 2023 | Meeting | National Grid held a Transport Working Group meeting with the Local Highways Authorities (including ECC). |
| November 2023 | Meeting | National Grid held a PRoW Thematic Group Meeting. |
| January 2024 | Meeting | National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) at the Transport Working Group. |
| March 2024 | Meeting | National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes. |
| April 2024 | Meeting | National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities. |
| June 2024 | Meeting | National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management. |
| June 2024 | Meeting | Meeting to discuss EACN and interaction with North Falls and Five Estuaries wind farm projects, and the proposed Norwich to Tilbury EACN permanent access between Bentley Road and Ardleigh road that would be required. |
| July 2024 | Email Correspondence | Proposed Abnormal Indivisible Load (AIL) Routes issued for comment. |
| July 2024 | Email Correspondence | ECC 2024 statutory consultation response received. |
| August 2024 | Meeting | National Grid held a Transport Working Group LHA engagement meeting with ECC. Highway mitigation on PARS from 2024 statutory consultation were presented. |
| September 2024 | Meeting | National Grid held a Transport Working Group Meeting with ECC and National Highways to discuss AIL routes. Overview of AIL vehicles provided. |
| October 2024 | Meeting | National Grid held a Transport Working Group Regional Meeting. All affected LHAs were in attendance. Highways Mitigation Design, schedules |

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

| Date | Format | Topic/Description |
|---|---|---|
| | | process and report with ECC, Essex and Suffolk police. |
| April 2025 | Email Correspondence | National Grid issued updated information pack for proposed AIL routes. |
| April 2025 | Meeting | National Grid held a Traffic and Transport Working Group Meeting. Section 42 targeted consultations closed. Latest updates given relating to engagement on AILS, PROWS and highways modelling. |
| April 2025 | Email Correspondence | ECC structural feedback for proposed AIL routes received (partial, but main piece of feedback received, i.e. AIL structures register issued to ECC in Feb 2025 was returned with comments) |
| April 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; high-level feedback received from ECC, ECC advising of the process to obtain structral records, requests for structural records by National Grid |
| May 2025 | Email Correspondence | ECC structural feedback for proposed AIL routes received (partial). |
| June 2025 | Meeting | National Grid held a Regional Stakeholder Meeting with ECC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed. |
| June 2025 | Meeting | National Grid held a workshop to discuss the methodology utilised to produce the construction trip generation with ECC. |
| June 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial). |
| July 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial). |
| August 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial). |
| August 2025 | Meeting | National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council. |
| August 2025 | Meeting | National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed. |

| Date | Format | Topic/Description |
|---|---|---|
| September 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial). |
| October 2025 | Meeting | National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council. |
| October 2025 | Meeting | National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed. |
| October 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial). |
| October 2025 | Email Correspondence | National Grid issued structural reviews to ECC for comments and technical approval. |
| November 2025 | Email Correspondence | ECC comments on structural reviews (issued October 2025) received. |
| November 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes. |
| November 2025 | Meeting | ~~Mott MacDonald~~National Grid held a meeting ~~on behalf of National Grid~~ to discuss Essex County Council's comments on Road Safety Audits and Highway Mitigation. |
| November 2025 | Meeting | Optional thematic group meeting to discuss feedback on the Traffic, Transport and ProW sections of the Environmental Statement. |
| December 2025 | Meeting | National Grid held a Traffic and Transport Working Group Meeting. |
| December 2025 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes. |
| January 2026 | Meeting | National Grid held a meeting with Essex County Council to discuss the informal consultation comments provided by ECC. |
| January 2026 | Meeting | National Grid held a meeting with Essex County Council to discuss Statements of Common Ground and to review their updated comments. |
| January 2026 | Email Correspondence | National Grid issued an Approval in Principle (AIP) for ECC review and sign-off for assessment of a structure along proposed AIL routes. |

| Date | Format | Topic/Description |
|---|---|---|
| January 2026 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes. |
| February 2026 | Meeting | National Grid held a meeting with Essex County Council to discuss ECC's feedback on the Ardleigh Road RSA matters, in particular speed limit changes. |
| February 2026 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes. |
| February 2026 | Email Correspondence | National Grid issued an AIP for ECC review and sign-off for assessment of a structure along proposed AIL routes. |
| February 2026 | Email Correspondence | Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes. |
| March 2026 | Meeting | National Grid held a meeting with Essex County Council to discuss the TRO approach for Norwich to Tilbury. |
| March 2026 | Email Correspondence | National Grid issued an AIP for ECC review and sign-off for assessment of a structure along proposed AIL routes. |
| March 2026 | Email Correspondence | National Grid requested structural record information for some structures along proposed AIL routes. |
| March 2026 | Email Correspondence | ECC structural record information received (partial). |
| April 2026 | Email Correspondence | ECC structural record information received (partial). |

# 3. Matters Agreed, Not Agreed or Under Discussion

## 3.1 Overview

3.1.1 This chapter details the matters relevant to ECC which have been agreed, not agreed or are ~~under discussion~~Under Discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.

3.1.2 The red, amber, green status shows the level of agreement with ECC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section ~~3~~3

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

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

3.1.4 ~~Table 3.3~~Table 3.2 to Table 3.15 provides the matters agreed, not agreed or ~~under discussion~~Under Discussion in relation to the various topics.

## 3.2 Project development, description and design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **Strategic options/needs case** | | | | |
| 3.2.1 | Needs case | Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia.<br>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.<br>~~National Grid's position regarding the integrated offshore solution mentioned by ECC is covered under 'onshore' below (ID 3.2.3).~~<br>For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~The Applicant considers it is unlikely that | ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and Alternatives (RR-1083). ECC's 'In Principle Strategic Objection' is further detailed within it's LIR **[REP1-161]** and other submissions to this Examination<br>ECC accepts that network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted / planned electricity generation in the East Anglia region. However, despite the acceptance of the need, ECC's in-principle objection continues to be for this need to be met using an integrated offshore solution that avoids the use of overhead powerlines due to their impact on communities and the environment.<br>ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | ~~Under discussion~~ Not Agreed |

| ID | Matter | National Grid's Position | Essex County Council's |
|---|---|---|---|
| | | the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed | ~~ECC's 'In Principle Strate detailed within it's LIR.~~EC for the ExA to consider. |
| 3.2.2 | Project timing | Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner Licence) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.<br>Annex 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.<br>For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed. | ECC would refer to it's Re Representation submissio 2025), section 4 – Project Alternatives (RR-1083).~~–~~ a its LIR **[REP1-161]** which ECC's 'In Principle Strate alongside other submissio Examination<br>ECC does not believe tha any new evidence or sens the conclusion of the Hior Norwich to Tilbury project 2030. While ECC has hac Register, ECC considers determining what future e more transparency is requ assumptions on the statu connections and what futu connections are actually l connect to the transmissio The Applicant must not re on future network expans the ESO contracted positi engagement would be we matter.<br>ECC agrees that is unlike agreed position will be fou agree that this matter is n<br>~~ECC is unable to respond~~ |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | | ~~position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~<br>~~ECC's 'In Principle Strategic Objection' is detailed within it's LIR.~~ECC accepts this is now for the ExA to consider. | |
| 3.2.3 | Onshore route | An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.<br>~~Updated Strategic Options and Backcheck Review documents~~<br>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.<br>For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore Alternatives' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**<br>**~~Updated position (February 2026):~~**<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference~~ | ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and Alternatives (RR-1083).~~–~~ and to Section 4.2 of its LIR **[REP1-161]** which provide detail on . ECC's 'In Principle Strategic Objection'. Alongside other submissions to the Examinination<br>ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.<br>The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts including landscape and visual impacts. If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be | ~~Under discussion~~ Not Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~8.4.1).~~The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed | explored in more detail (such as off-shore and High Voltage Direct Current undergrounding). This is to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme, and if so, put them forward at pace to achieve the required network reinforcement instead of the submitted scheme. Further discussion would be welcomed on this matter.<br>ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~<br>~~ECC's 'In Principle Strategic Objection' is detailed within it's LIR.~~ECC accepts this is now for the ExA to consider. | |
| 3.2.4 | Predominantly overhead line route | Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.<br>~~Updated Strategic Options and Backcheck Review documents~~Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including | ECC would refer to it's Relevant Representation submission (27 November 2025), section 4 – Project Need Case and Alternatives (RR-1083).~~ ~~ and to Section 4.2 of its LIR **[REP1-161]** which provide detail on ECC's 'In Principle Strategic Objection' alongside other submissions to the Examination.<br>ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is | ~~Under discussion~~ Not Agreed |

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| | | underground alternatives.<br>The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic bills.<br>For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed | considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.<br>Localised design responses involving undergrounding and /or alternate pylon design as part of the application of the mitigation hierarchy, should not be discounted by NG. The County Council consider such an approach would not be contrary to national policy statements and would actually be consistent with Holford Rule 7 where it states projects should be routed to minimise as far as possible effects on development.<br>ECC contends that insufficient weight has been to the effects of development on existing and / or planned development as well as broader strategic objectives to deliver new homes, to inform more appropriate localised design responses.<br>ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~<br>~~ECC's 'In Principle Strategic Objection' is detailed within it's LIR.~~ECC accepts this is now for the ExA to consider. | |
| 3.2.5 | Policy compliance | In deciding an application for development consent Section 104 of the Planning Act 2008 requires the Secretary of State to determine the | ECC sought legal advice in confirming that there is presumption in favour of approving an NPS compliant scheme and that the SoS must | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | application in accordance with any relevant National Policy Statement (NPS). The NPSs relevant to this project are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) which came into force in January 2024. The National Policy Statement for Renewable Energy (EN-3 2024) also includes support for the onshore infrastructure required to deliver new offshore wind developments.<br>Norwich to Tilbury has been developed in line with these National Planning Policies, and more information can be found in ~~the 2024 Design Development Report~~ **7.21 2024 - Design Development Report for the Project 2024 Design Development Report [APP-359]** and **5.152025 Design Development Report [APP-122]**.<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~For the Applicant's position on policy compliance, please refer to Section 4.2 'Planning Policy' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | determine a DCO application in accordance with the relevant NPS, unless one of a range of specified exceptions applies. The advice did however acknowledge that a decision can be made other than in accordance with the NPS and in accordance with S104(7) of the Planning Act 2008, where the adverse impact and of the proposed development would outweigh its benefits of the project.<br>In so doing, the advice clarified the importance of clear robust evidence to support any identified harm, if the ExA and/or the Secretary of State are to be in a position to give consideration to an argument that the adverse impacts of the scheme outweigh the benefits, or that the residual impacts after mitigation has been applied render the circumstances truly exceptional, whereby consent could be refused or the scheme modified, with no breach of the relevant statutory or policy requirements.<br>The advice also confirmed that weight is to be applied to local plan policy and strategic designations and when the projects critical national priority (CNP) status is applied in the overall decision-making process.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ECC acknowledges the Applicants position set out in Section 4.2 'Planning Policy' in 8.8.2 Applicant's Comments on Local Impact Reports **[REP2-030].** However, due to the nature of going discussions regarding the | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | approach to mitigation, considers this should remain Under Discussion. | |
| **Project development process – Design** | | | | |
| 3.2.6 | Dunton Hills Garden Village | For the Applicant's position on Dunton Hills Garden Village, please refer to Section 3.8 'Alternatives – Dunton Hills Garden Village' and Appendix B in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** | ECC would refer to it's Relevant Representation submission (27 November 2025), section 6.2 Dunton Hills Garden Village (RR-1083) and section 4.2 of it's Local Impact Report (REP1-161) where it sets out its concerns regarding the impact of the project on the development of DHGV<br>Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. ECC therefore maintains this will degrade the principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery.<br>Given the current housing need within Basildon / Brentwood and across the region, the importance of this development in terms of numbers and infrastructure being delivered, this situation is not acceptable to ECC.<br>ECC is seeking alternative design solutions and / or mitigation along this section of the proposed route to avoid any impact on housing numbers, viability, infrastructure, design principles and delivery. Further discussion on mitigation with the Applicant is ongoing. | Under Discussion |

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| ~~3.2.6~~3.2.6a | Dunton Hills Garden Village – Technology choice | ~~National Grid has taken into account the potential effect of its proposals when developing the route alignment. In this location we have to work within the context of the planning status of other projects, including the Dunton Hills Garden Village proposals.~~<br>National Grid has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5.<br>~~The~~**7.21 2024 - Design Development Report ~~(~~for the Project [APP-359~~)~~]** identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed master planning, would substantially mitigate potential effects on developable land and indirect effects.<br>~~National Grid will continue to engage with ECC on this matter.~~ | As set out within the Local Impact Report (REP1-161) it is recognised that as a matter of principle, overhead power lines are referenced in Government policy (NPS-EN5) as the starting presumption for electricity network developments. Nevertheless, paragraph 2.9.7 of EN5 acknowledges the effects of new overhead lines and that they can give rise to adverse landscape and visual impacts, with national policy supporting the use of alternative technological solutions in certain situations. While this is primarily aimed at protecting nationally designated landscapes, it does not preclude alternative solutions being promoted in other scenarios where adverse landscape and/or visual impacts may exist - such as would occur here, impacting on an important strategic housing development designed to secure high environmental, sustainability, health and well-being outcomes.<br>~~ECC would refer to it's Relevant Representation submission (27 November 2025), section 6.2 Dunton Hills Garden Village (RR-1083). Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. The County Council therefore maintains this will degrade the principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery.~~ | Under ~~discussion~~Discussion |

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| | | | ~~Given the current housing need within Basildon / Brentwood and across the region, the importance of this development in terms of numbers and infrastructure being delivered, this situation is not acceptable to ECC.~~<br>~~ECC is seeking alternative design solutions and / or mitigation along this section of the proposed route to avoid any impact on housing numbers, viability, infrastructure, design principles and delivery. Further discussion on this matter would be welcomed.~~ ECC is in discussion with the Applicant and is awaiting further information regarding the impact of underground lines and potential mitigation. | |
| 3.2.6b | Dunton Hills Garden Village – T-pylons | **5.15 Design Development Report [APP-122]** sets out that where there is not a reversal of the presumption within EN-5 to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations where there could be a design preference for T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not considered to be engaged and, accordingly, there is no justification for T-pylons to be used on the Project. | ECC consider that placing the route underground for the length that it runs through / alongside the Garden Village would accord with the principles of good design and minimise the impact, safeguarding the viability and deliverability of DHGV. If this is not feasible, alternate pylon design should be considered alongside any identified mitigation to minimise the impact of the Norwich to Tilbury project.<br>While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), ECC considers greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. As stated at Para 2.5.9 of the Design Development | Under Discussion |

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| | | | Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted but ECC considers this would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV.<br>ECC is in discussion with the Applicant and is awaiting further information regarding the impact of underground lines and potential mitigation. | |
| 3.2.6c | Dunton Hills Garden Village – ability of overhead lines and housing developments to co-exist | Overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. | The objective of the Garden Communities Programme is to create distinctive, high-quality, sustainable communities, which go beyond the qualities of 'standard' housing developments, and which also meet housing needs while improving the quality of life experienced by residents. Having Garden Village status recognises the potential of the new settlement to embed garden city principles in a locally led vision for the site and the opportunity to develop a distinctive new place that is of high aesthetic and environmental quality, is attractive to live and work in and is a well-designed sustainable development which draws on strong references to the local area and surrounding environment. This translates | Under Discussion |

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| | | | locally into the DHGV Framework Masterplan and the DHGV SPD which set out mandatory and advisory principles to deliver the exemplar development required. ECC maintains it's concerns as to whether the overhead lines will have a negative impact on these principles | |
| 3.2.6d | Dunton Hills Garden Village – effect of the project on the quantum of development | The Applicant does not consider there needs to be a direct impact on the quantum of development at Dunton Hills Garden Village. The Project has been designed to follow an existing gas pipeline through and within a corridor formed by the Building Proximity Distance in the vicinity of the Dunton Hills Garden Village proposal to reduce potential effects. | ECC acknowledges that the route alignment should not affect the quantum of development proposed at DHGV but as set out in the Savills report commissioned by ECC, is concerned about the impact on viability and the ability to deliver policy compliant levels of affordable housing.<br>A response to the Applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs **[REP2-030]**, will be provided at Deadline 4. | Under Discussion |
| 3.2.6e | Dunton Hills Garden Village – viability, gross development value and landowner compensation | The Project should not impact GDV to any meaningful significant extent, certainly not enough to impact viability, and that any loss that may be suffered will be suffered by the landowner (in land value) and for which they have a recourse to compensation | ECC's response to the Applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs **[REP2-030]**, will be provided at Deadline 4. | Under Discussion |
| 3.2.6f | Dunton Hills Garden Village – location of the play area | Based on the current plans, the Project will not directly affect the location of the play area (referred to as a Local Equipment Area for Play or LEAP). Land around and underneath the | ECC acknowledges that potential exists to relocate the LEAP play area. It considers this matter can be moved to agreed | Agree |

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| | to the south eastern corner of the DHGV site | proposed overhead line can be utilised by DHGV as open space as per the relevant masterplan. The DHGV site is still at the formative stage and the play area in question is located in phase 3A, planned for development in years 13-15. The Applicant is of the opinion that given the phasing, it is likely that phase 3A of DHGV would move into detailed design and the associated planning application(s) with the new overhead line in operation, therefore the play area could be located sensitively to the Project and both can co-exist accordingly. | | |
| 3.2.6g | Dunton Hills Garden Village – tree planting | The Applicant will seek to work with the landowner (LIH), Essex County Council and Brentwood Borough Council in relation to the DHGV site to explore and understand the requests for further tree planting in this area | ECC understands that following a meeting with the Applicant on 31/03/26, the Applicant will consider what the landscape compensation could be as mitigation for the harm to DHGV. ECC would welcome further engagement on this and is keen to ensure this is secured accordingly. | Under Discussion |
| 3.2.7 | Design principles | The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational reliability, can significantly limit National Grid's ability to adapt the aesthetic appearance of its infrastructure.<br>Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules (relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end | ECC would refer to it's Local Impact Report **[REP3-0161]** would concerns about the approach to design are outlined<br>~~ECC would refer to it's Relevant Representation submission (27 November 2025), section 6.4 Design (RR-1083).~~ The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals.<br>While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and documented through the Development Consent Order process.<br>Furthermore, NPS EN-1 encourages developers "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible" within the bounds of functional and safety constraints.<br>The Planning Inspectorate Good Design advice advises that 'Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important'. EN-1 refers to the importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the **7.15 Design and Access Statement** | place and takes account of often complex environments. Further, the Council also draws on the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design which has been prepared based on good practice and applicants are encouraged to follow the recommendations set out. In particular, it is noted the advice states "Good design is crucial for achieving excellent functionality, sustainability, positive place-making and resilience in NSIPs".<br>The Council feels there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. It is supportive of the concerns raised by Tending District Council regarding the impact of the proposed infrastructure on the environment around Ardleigh. ECC expects to see the Applicant working alongside the promoters of North Falls (EN010119), Five Estuaries (EN010115) and Tarchon Interconnector, to ensure a joined up approach in the design of the infrastructure located in Ardleigh, and would expect engagement in any design review processes.<br>ECC would wish to see commitments around the issue of design informing the draft DCO / Schedule of Requirements.<br>NGET must follow a good design process to ensuring that the infrastructure proposed remains functional and safe while giving sufficient consideration to and realising the best local design and environmental outcomes for | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | [~~APP-353~~REP2-020].<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~For the Applicant's position on Design principles, please refer to Section 3.9 'Good Design' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** | the project.<br>ECC would also refer to it's response to ExQ1 question DES 1.3 from (REP3-078), including the need for the project to undergo independent design review, and the need for this to be secured appropriately through the DCO.<br>~~Further discussion on this topic matter would be welcomed.~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | |
| **Project development process - Consultation** | | | | |
| 3.2.8 | 2022 non-statutory consultation | Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation ~~are outlined in the Consultation Strategy,~~ and responses to feedback received during consultation are included in ~~the Feedback Report.~~<br>**5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]**. The non-statutory consultation was undertaken in accordance with the published ~~Consultation Strategy~~Consultation Strategy. | ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy<br>ECC refers to its response to this consultation dated 16th June 2022. | Under Discussion |
| 3.2.9 | 2023 non-statutory consultation | Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the ~~Consultation Strategy~~Consultation Strategy, and responses to feedback received during consultation are included in ~~the Feedback Report~~**5.1 Consultation Report - Appendix C: 2023** | ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy<br>ECC refers to its response to this consultation dated 14th August 2023. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | **non-statutory consultation [APP-069]**.<br>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy. | | |
| 3.2.10 | 2024 statutory consultation | Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in ~~the Statement of Community Consultation (SoCC).~~**5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]**. Responses to feedback received during statutory consultation are ~~contained~~available within ~~the~~**5.1 Consultation ~~Feedback~~ Report [APP-066]**.<br>The statutory consultation was undertaken in accordance with the published SoCC. | ECC acknowledges the nonstatutory consultation was undertaken in accordance with the Statement of Community Consultation.<br>ECC refers to its response to this consultation dated 26th July 2024. | Under Discussion |
| 3.2.11 | 2025 targeted consultation | Targeted consultations for Essex took place from 25 February - 27 March 2025. Details of these consultations are outlined in the ~~Targeted Consultation Strategy~~Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within ~~the~~**5.1 Consultation ~~Feedback~~ Report - Appendix K: Targeted Consultation 2025 [APP-~~066~~-077]**.<br>The targeted consultations were undertaken in accordance with the published Targeted | ECC acknowledges the non-statutory consultation was undertaken in accordance with the Targeted Consultation Strategy<br>ECC refers to its response to this consultation dated 15 April 2025.<br>ECC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process including the lack of feedback to the statutory consultation undertaken in summer 2024 and which informed the scope of the targeted consultation, was considered harmful to the transparency and legitimacy of the process. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Consultation Strategy.<br>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024). | It is also felt that some changes to the scheme may not be the most significant and are considered to be non-material, ECC considers that to local residents who may reside close to them, their significance may be greater, and they should therefore be given an opportunity to comment on them through the targeted consultation carried out earlier this year.<br>The concentration of non-material changes may also have a bearing on their materiality and how they are experienced by local residents.<br>ECC would refer to it's Adequacy of Consultation submission (AoC-009) and it's Relevant Representation submission (~~27~~27th November 2025), section 2 ECC's Pre-application Engagement with the Applicant (RR-1083).<br>The targeted consultation is completed however ECC continues to consider that National Grid must implement an effective and open engagement process and beyond through ~~this Pre-Examination and~~the Examination stage to ensure all those participating in the process feel adequately informed. | |
| **Other matters as required** | | | | |
| 3.2.12 | Community benefits | ~~**Updated position (February 2026):**~~<br>~~Socio-economic impacts on the local economy and the tourism sector are assessed in **6.15 Environmental Statement Chapter 15 -**~~ | ~~ECC Response to Targeted Consultations (15/04/2025):~~<br>ECC considered Norwich to Tilbury (N2T) will have extensive residual impacts that adversely | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~**Socio-economics, Recreation and Tourism [APP-265]**. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.~~<br>~~In addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its guidance on community funds for transmission infrastructure (DESNZ, 2025). The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.~~<br>~~This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025)[14]. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA. National Grid will continue to engage with ECC on this matter.~~The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material | affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Also, the national benefits will not offset the harm at a local level.<br>ECC have strongly ~~encouraged NGET~~encouraged the Applicant to respond positively to the issue of social value and community benefits as set out ~~in our response to the statutory consultation in 2024~~various stages of the NSIP process particularly having regard to the Governments ~~recently~~r published Community Funds for Transmission Infrastructure.<br>~~In particular, significant~~Significant benefits should be realised from N2T for education, skills, and employment during construction and operation, alone and cumulatively with other NSIPs.<br>With reference to ECC's Relevant Representation submission (27 November 2025), section 2 ECC's Pre-application Engagement with the Applicant (RR-1083) there has been little progress from National Grid on this matter.<br>It is considered that this will be a key area of ~~disagreement unless clarity is provided as soon as practically possible~~focus for ECC.<br>ECC would expect to be consulted on this matter to ensure that where community funds are delivered, real long lasting benefits are | |

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| | | consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. Later in spring 2026, the Applicant will begin consulting on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits. . | delivered for the communities impacted by the development.<br>~~Further discussion would be welcomed on this topic~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~Although it is recognised this matter is not a material consideration in the decision on the proposed project, given the importance of this issue, this matter remains Under Discussion until meaningful engagement takes place between National Grid and ECC. | |

## 3.3 Ecology and Biodiversity

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.3.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**.<br>All relevant legislation, policy and guidance | The ES has identified the relevant legislation, policy and guidance.<br>EPS confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~has~~have been identified and appropriately considered to inform the assessment. | | |
| **EIA – Approach and Methods** | | | | |
| 3.3.2 | Study area | The study area was agreed through ~~the EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.3.3 | Data sources | Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**.<br>**~~Updated position (February 2026):~~**<br>Further survey information from the 2025 season ~~has been~~was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits **[AS-026 to AS-~~45~~-045]**. | Sufficient desktop data has been collected for the ES.<br>EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to bat survey data which requires further information and is noted in ID 3.3.18. | Agreed |
| 3.3.4 | Assessment Methodology | National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.<br>All methodologies for surveying licensable species, including water voles have been agreed with Natural England. | The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.3.5 | Survey Methodology | National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement/ comment.<br>All methodologies for surveying licensable species have been agreed with Natural England. | The survey methods used are largely accepted, although note the comments made for ID 3.3.11.<br>EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~ | all areas apart from in relation to survey methodology for bats which requires further information. | |
| 3.3.6 | Key parameters and assumptions | Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised ~~in~~ Section 8.4 of **6.8 Environmental Statement Chapter 8 (~~-~~ Ecology and Biodiversity~~)~~ ~~of the ES~~ [AS-026]**. The key parameters and assumptions presented are considered appropriate.<br>**~~Updated position (February 2026):~~**<br>National Grid has committed to a 5-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for ~~DCO~~development consent projects of this scale. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [APP-299]**.<br>National Grid ~~await~~awaits further response from ECC~~ on requirements~~. | The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "*Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4))*", is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement.<br>ECC acknowledges the Applicants position that a 5 year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), is considered sufficient. However, after further consideration, ECC considers this period of aftercare and management is insufficient and leaves open a credible possibility of a high failure rate detrimental to the quality of replacement planting.<br>~~ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under further review and that ECC will provide further~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~comment following consideration around reinstatement.~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ECC remains open for further discussion on this matter and would like to explore with the Applicant appropriate commitments to high-quality care within the 5yr management period. | |
| **EIA – Baseline Conditions** | | | | |
| 3.3.7 | Baseline conditions and receptors | The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. The baseline conditions and receptors presented are considered appropriate.<br>**~~Updated position (February 2026):~~**<br>Further survey information from the 2025 season ~~has been~~was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. | ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline conditions and receptors for bats which requires further information. | Agreed |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.3.8 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature | The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated.<br>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | and scale, to address potential effects. | | |
| 3.3.9 | Standard mitigation | Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]** and set out in the **7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Draft LEMP documents have been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions to those documents.<br>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID 3.3.21. | Agreed |
| 3.3.10 | Additional mitigation | The consideration of additional mitigation measures ~~are~~is presented in **Section 8.6** of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.21).<br>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. | Agreed |
| **EIA – Assessment Conclusions** | | | | |
| 3.3.11 | Construction effects | The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. The assessment of effects during construction presented is considered appropriate.<br>**~~Updated position (February 2026):~~**<br>~~Table~~Tables 8.23 and 8.24 within ~~biodiversity chapter~~**6.8 Environmental Statement Chapter 8 Ecology and Biodiversity [AS-026]** do not | It would be useful transparency to advise on how long ~~is~~ it is predicted to take for the long-term neutrality to be achieved for the affected receptors.<br>The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1–10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated.<br><br>The ~~survey approach to~~ bat roost ~~surveys has been~~survey scope was agreed with Natural England ~~(the statutory responsible body for bats) and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.~~, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed | ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation.<br><br>Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, "*the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees [*any number of which could be classified PRF-M after further survey] *and 16 trees with hibernation features.*"<br><br>As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected.<br><br>The potential impact without any mitigation measures being applied is described in the ES Table 8.23: "*In the absence of mitigation, the* | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features.<br>Refer to Table 4.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for a more detailed response on bat surveys. | *direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within the Order Limits. Effects would be considered significant*." However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s) (i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.9, this is not considered to be a reasonably supported assessment.<br>What is being proposed is a quasi District Level Licence-type approach for roosting bats (i.e. getting DCO without first completing surveys), when ECC is not aware of any such DLL method for bats having been trialled and approved.<br>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that concerns regarding the effects of construction remain and that this matter ~~is still under~~requires further discussion~~, and that~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~further clarification is sought around timeframes.~~ .<br>Further to a meeting with the Applicant / Arcadis on 23/04/26, where ECC's position was clarified, the ongoing discourse is currently focusing on securing an agreed level of bat roost tree resource compensation. | |
| 3.3.12 | Operational (and maintenance) effects | The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. The assessment of effects during operation (and maintenance) presented is considered appropriate. | The assessment of effects during operation (and maintenance) is considered appropriate.<br>ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed. | Agreed |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.3.13 | Outline CoCP | ~~The~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [ REP3-025]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]** and is appropriate for managing construction impacts from the Project.<br>The Project role and responsibilities of the various clerk of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** The various Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice. These roles would be delivered by multiple individuals | The Outline CoCP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated ~~22nd~~22 November 2024 and ~~19th~~19 February 2025.<br>Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, ECC would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. ECC would also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project.<br>B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | across the Project, depending on the specific requirement/task.<br>~~A meeting was held in October 2024 to agree on the structure for **the Outline CoCP [APP-300]**.~~<br>~~A meeting was held in March 2025 to discuss the second iteration of **the Outline CoCP [APP-300]**.~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the meeting and feedback in writing.~~<br>~~**Updated position (February 2026):**~~<br>~~Full details of the ECoW's qualifications / experience will be provided within the final CoCP.~~ As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further detail on the multiple specific individuals undertaking these roles would be available post-consent as part of the final Landscape and Ecological Management Plan/s. | class licensed (level 2+ if endoscoping required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification.<br>B16 – see comments for ID 3.3.9.<br>~~ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around EcoWs.~~ This issue remains under review and the subject of ongoing discussion. Following a meeting with the Applicant / Arcadis on 23/04/26, ECC believes there is common ground in the desire to ensure effective ECoW function during the construction phase of the project. At this meeting ECC and the Applicant / Arcadis agreed to consider further on a suitable description of the necessary qualifications/experience required of a ECoW. One possibility mentioned was for an Ecology Advisory Board to review (and presumably vet?) and give approval for appointed ECoWs. With more detail, ECC is not adverse to this approach in principle. | |
| 3.3.14 | Outline LEMP | ~~The~~**7.4 Outline** ~~LEMP [AS-046~~**Landscape and Ecological Management Plan [REP3-030]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]** and is appropriate.<br>~~Meeting held in October to agree on the structure for the **Outline LEMP [AS-046]**.~~ | The Outline LEMP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19th February 2025.<br>With respect to paragraph 6.1.8, clarity regarding the criteria used for defining a tree's bat hibernation potential is sought? Given that there appear to be fewer trees with hibernation | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~Meeting held in March 2025 to discuss the second iteration of the **Outline LEMP [AS-046]**.~~<br>~~A further iteration of the **Outline LEMP [AS-046]** was issued in May 2025 following the meeting and feedback in writing.~~<br>~~**Updated position (February 2026):**~~<br>Natural England ~~(~~, as the primary statutory ~~responsible body for~~advisor and competent authority on roosting bats~~),~~ has approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility.<br>The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above. | potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features?<br>ECC remains of the opinion that the evaluation undertaken is not properly acknowledging the full extent of trees with hibernation roost potential. However, ECC hopes this this can be addressed under the discussion concerning the compensation offering for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.<br>~~ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around bat hibernation.~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| **Other matters as required** | | | | |
| 3.3.15 | Biodiversity Net Gain (BNG) – Onsite and Assessment | National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. The **7.1 Biodiversity Net Gain Report [APP-299]** sets out the approach to BNG.<br>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.<br>National Grid will continue to engage with ECC on this matter. | ECC would like this matter to remain ~~under discussion~~Under Discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved. This includes clarity on the application of the mitigation hierarchy, transparent accounting to avoid double-counting, governance and monitoring arrangements, and how on-site BNG delivery aligns with the Essex Local Nature Recovery Strategy. ECC considers that there must be confidence in the reinstatement planting being effective and achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur. | Under ~~discussion~~Discussion |
| 3.3.16 | Biodiversity Net Gain (BNG) - Offsite | National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. ~~The~~ **7.1 Biodiversity Net Gain Report [APP-299]** sets out the approach to BNG.<br>Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain Report [APP-299],** the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others, including the local | ~~ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Offsite BNG~~While the basic approach of the Applicant to the delivery of BNG is noted, further detail on how offsite BNG is to be delivered is required delivery is required. . In particular, location, governance, and delivery of offsite BNG. Furthermore, ECC seeks greater certainty and commitment on how offsite BNG will be spatially aligned with the Essex Local Nature Recovery Strategy, the extent to which delivery within Essex will be prioritised, the role of local delivery partners, and the mechanisms for securing long term management, monitoring, and stewardship. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances.<br>Offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.<br>~~National Grid will continue to engage with ECC on this matter.~~ | | |
| 3.3.17 | Arboriculture Impact Assessment (AIA) | ~~National Grid issued the draft AIA in March 2025.~~<br>The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including appendices B to K [APP-296]** and is considered appropriate for this stage of the project.<br>No comments received to date on the AIA from ECC. | This remains Under Discussion pending agreement to proposed mitigation. | Under ~~discussion~~Discussion |
| 3.3.18 | Data sources (bats) | Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026].**<br>Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated version of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. The provision of this additional | As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending.<br>As late November 2025, ecological surveys have been completed on all but 3% of the total land within the Order Limits. This is not | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | data does not change the conclusions of the assessment submitted in August 2025. All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [APP-158].**<br>~~**Updated position (February 2026):**~~<br>~~Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.~~The Applicant considers that since additional survey results were submitted in November 2025 this matter can be moved to Agreed | considered an excessive or unreasonable omission given the overall area covered by the Order Limits and the inevitability of certain access constraints. | |
| 3.3.19 | Survey Methodology (Bats) | ~~National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.~~<br>~~All methodologies for surveying licensable species have been agreed with Natural England.~~<br>~~**Updated position (February 2026):**~~<br>The ~~survey approach to~~ bat roost ~~surveys has been~~survey scope was agreed with Natural England~~ and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.~~ , as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the primary statutory | Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECC believes further survey effort prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data-based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/compensation scheme.<br>ECC accepts the reasoning for a bespoke bat roost tree survey method. However, ECC is of the opinion that the limitations of the survey method used need to be acknowledged and reflected by a conceded degree of uncertainty in the impact assessment. That impact | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features.<br>Due to the transient nature of bat tree roosts, pre construction surveys would be undertaken of all trees due to be lost with suitability to be used by roosting bats, to confirm the presence/absence of roosting bats, prior to felling/pruning. Where the presence of a roost is confirmed, mitigation measures, as agreed with Natural England, would be delivered under licence to ensure no impact on the favourable conservation of bats. A draft Project wide bat licence has been prepared through consultation with Natural England where likely impacts and appropriate mitigation measures for each different species and roost type likely to be encountered are given. The draft Project-wide licence has been prepared where likely impacts have been assessed and a percentage of all trees with PRFs likely to support roosting bats has been agreed with Natural England. The draft Project-wide licence sets out appropriate mitigation measures for each different species and roost type likely to be encountered and | assessment uncertainty then needs to be counteracted by a suitably precautionary mitigation plan. ECC hopes this matter can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.<br>Confirmation of Natural England's position and their letter supporting the contents of the draft Project-wide licence would also be welcome. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | includes measures such as provision of bat boxes and tree veternatisation. Natural England has been consulted throughout the survey design and development of the mitigation approach as presented within the draft licence and are in support of the approach. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination. | | |
| 3.3.20 | Baseline conditions and receptors (Bats) | The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. The baseline conditions and receptors presented are considered appropriate.<br>~~**Updated position (February 2026):**~~<br>The ~~survey approach to~~ bat roost ~~surveys has been~~survey scope was agreed with Natural England~~ and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures~~, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a | ECC ~~confirmed in meeting regarding the Statement of Common Ground in January 2026~~is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review.<br>ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. | | |
| 3.3.21 | Standard mitigation (Bats) | Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]** and set out in ~~the~~**7.2 Outline ~~CoCP~~ ~~[APP-300~~Code of Construction Practice [REP3-025]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~**Updated position (February 2026):**~~<br>The ~~mitigation approach to~~ bat roost ~~surveys has been~~survey scope was agreed with Natural England~~ and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.~~<br>, as evidenced **within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree | Measure B16's assumption that any action requiring a Natural England derogation licence can be "*reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit*" is considered unsound. ECC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11.<br>ECC ~~confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for~~is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review.<br>ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. ~~National Grid will continue to engage with ECC on this matter.~~ | Confirmation of Natural England's position and their letter supporting the contents of the draft Project-wide licence would also be welcome | |

## 3.4 Green Infrastructure

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **Ecology and Biodiversity Matters** | | | | |
| 3.4.1 | Data sources (Ecology Matters) | The Applicant confirms that a robust evidence base, including desk-based and field survey data, was used in the environmental assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. This is considered sufficient to inform the assessment. As such, the LNRS has not been used to inform the baseline characterisation or impact assessment of existing habitats.<br>~~Sufficient desktop and survey data has been collected to inform the assessment as presented within **Section 8.4** of **Chapter 8** (**Ecology and Biodiversity**) of the **ES [AS-026]**.~~ | ~~In respect of Green Infrastructure matters:~~<br>~~The~~ECC consider the Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study to inform the identification of existing habitats and to guide the selection of appropriate locations for mitigation and compensation measures. ~~It~~While ECC recognises the value of field survey data in establishing site specific baseline conditions, the LNRS provides a spatial framework for identifying ~~opportunities to enhance biodiversity and deliver~~strategic ecological networks, opportunity areas, and priorities for nature recovery across Essex. Including LNRS | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~Notwithstanding this, the Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances. | mapping ~~ensures~~supports alignment with national policy objectives and ~~supports~~ coordinated, cross-boundary environmental planning that reflects local priorities and ecological networks.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with very limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ECC would welcome the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, alongside existing desk based and field survey data, to inform the identification and spatial alignment of mitigation, compensation and enhancement measures associated with the Project where relevant within Essex, and not solely in the context of off site BNG delivery. | |
| 3.4.2 | Standard mitigation | The Applicant acknowledge's ECC's request to further integrate Green Infrastructure principles within the mitigation hierarchy.<br>The Applicant confirms that the Project has been developed in accordance with the mitigation hierarchy.<br>The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a | ~~In respect of Green Infrastructure:~~ ECC welcomes the inclusion of embedded and standard mitigation measures within the Outline LEMP and CoCP. However, ECC ~~would encourage National Grid to~~considers that further ~~integrate~~integration of GI principles within the mitigation hierarchy, would strengthen the approach, ensuring that ecological, hydrological, ~~and~~ landscape, and community functions are delivered in ~~an integrated~~a coordinated and multifunctional manner. GI should be designed to ~~provide~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | proportionate and holistic manner, considering the specific characteristics and constraints of the Project.<br>The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate.<br>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026]** and set out in the **7.2 Outline** ~~CoCP~~ **[APP-300Code of Construction Practice [ REP3-025]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~ | ~~multifunctional~~maximise benefits, such as flood mitigation, biodiversity enhancement, and community wellbeing (including PRoW) ~~are maximised~~ across the route where possible.<br>ECC would recommend that GI corridors be aligned with existing ecological networks and PRoW to enhance connectivity and accessibility, particularly in areas of landscape sensitivity and community use.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with very little time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ ECC would welcome further discussion with the Applicant on the approach to mitigation. | |
| 3.4.3 | Additional mitigation | The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project.<br>The consideration of additional mitigation | ~~In respect of~~ Green Infrastructure~~: GI~~ delivery should be explicitly aligned with the Essex GI Strategy and Essex GI Standards and reflect the priorities identified in the Essex LNRS, ensuring that mitigation and enhancement measures contribute to wider landscape-scale recovery.<br>Where habitats such as hedgerows and trees are removed, they should be reinstated with enhanced hedgerow habitats using locally | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | measures ~~are~~is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 ~~(~~- Ecology and Biodiversity~~) of the ES~~ [AS-026]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. ~~**Document**~~ **7.1 Biodiversity Net Gain Report [APP-299]** highlights that the Order Limit Hedgerows are to be enhanced to meet the minimum net gain requirement (+10 %), including native species as highlighted in ~~7.1~~**7.4 Outline ~~LEMP [APP-041]~~ Landscape and Ecological Management Plan [REP3-030]**<br>The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain Report [APP-299]** ~~confirms that National Grid will consider Local Nature Recovery Strategy areas as part of the offsite BNG selection process where sites are available and appropriate to project circumstances~~. National Grid also aims to deliver biodiversity legacy within the three counties crossed by the Project (Norfolk, Suffolk and Essex).<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~ | important native species and local seed stock, in consultation with wildlife groups across Essex.<br>ECC recommends that discussions be held to secure off-site biodiversity compensation within Essex, with a preference for delivery within strategic habitat opportunity areas identified in the Essex LNRS. To ensure long-term ecological benefits, ECC also encourages the establishment of stewardship agreements with local wildlife groups such as Essex Wildlife Trust, ECC, Place Services, and relevant Local Authorities.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ | |
| 3.4.4 | Outline LEMP | The Applicant acknowledges ECC's request to | ~~In respect of Green Infrastructure:~~ ECC | Under |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | extend the monitoring period for landscape to 10 years and to secure a 30 year management period for BNG and associated GI.<br>The ~~Outline LEMP includes all relevant operational related mitigation measures specified in **Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]** and is appropriate.~~Applicant confirms that a five year monitoring period for tree and hedgerow planting is proposed. This is considered sufficient to demonstrate successful establishment and is consistent with the approach taken on other recent NSIPs, including those promoted by National Grid.<br>~~National Grid~~The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [APP-299].**<br>The Applicant considers that this combined approach ensures both effective establishment of mitigation and delivery longer-term environment benefits. The Applicant will continue to engage with ECC on the detail of management proposals; however, the proposed monitoring period is considered appropriate.<br>**7.4 Outline Landscape and Ecological Management Plan [REP3-030]]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**).<br>Detail on habitat management and monitoring for | requests clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery. ECC recommends that the Outline LEMP include a robust monitoring framework ~~with~~incorporating adaptive management provisions and opportunities for stakeholder engagement to ensure the longevity and effectiveness of GI and BNG measures.<br>While HMMP and LEMP are standalone documents, ECC ~~recommend~~recommends that the BNG delivery ~~be~~is clearly cross referenced within the Outline LEMP ~~and~~, supported by a ~~clear~~transparent monitoring framework, including adaptive management provisions and community engagement.<br>ECC welcomes the Applicant's commitment to a 30 year management and maintenance period for Biodiversity Net Gain and associated Green Infrastructure within Environmental Areas.<br>ECC recommends extending the monitoring period for landscape (GI) delivery to 10 years, in line with best practice demonstrated by other NSIPs (e.g. Five Estuaries and North Falls Offshore Wind Farms), ~~and a 30-year management period for BNG/GI associated with EACN and substation landscape plans. The proposed 10-year~~. ECC considers that the proposed monitoring period could be structured into two phases: comprising an initial 5-year period of high-frequency establishment monitoring, followed by a ~~subsequent~~further | ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | the Environmental Areas will be set out in the final Landscape and Ecological Management Plan post consent.<br>~~A meeting was held in October to agree on the structure for the **Outline LEMP [AS-046]**.~~<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline LEMP [AS-046]**.~~<br>~~A further iteration of the Outline LEMP [AS-046] was issued in May 2025 following the meeting and feedback in writing.~~<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~ | 5-year period of lower-frequency development monitoring<br>, to demonstrate successful long-term establishment and functionality.~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ | |
| 3.4.5 | Biodiversity Net Gain (BNG) | ~~National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers.~~<br>The Applicant acknowledges ECC's request to adopt a higher figure than the minimum 10% BNG.<br>While there is no current legal obligation for BNG on NSIPs, the Applicant's approach to BNG has been to meet the policy requirements within the national policy statements, deliver its corporate commitments of at least 10% BNG with wider benefits, maximise the benefits and value from consumer-funded BNG and to follow the spirit of the Town and Country Planning Act 1990 BNG legislation and guidance including using the | ~~In respect of Green Infrastructure:~~ ECC supports the commitment to deliver at least 10% BNG. The Essex Local Nature Partnership (including LPAs) are working towards a joint approach to BNG, including potential joint specific measurable targets (20% BNG). It is recommended that National Grid consider adopting a higher figure than the minimum 10% requirement within the Environment Act (2021). ECC and the Essex Local Nature Partnership has published its `Viability Assessment of Biodiversity Net Gain in Essex, February 2025'. The viability assessments demonstrate that a 20% BNG is achievable and viable and meets the NPPF requirements, which emphasises measurable net gains for biodiversity. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Statutory Biodiversity Metric.<br>The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain Report [APP-299]**.<br>~~National Grid shared~~The Applicant welcomes the opportunity to discuss the Biodiversity Net Gain ~~strategy~~Report further with ~~stakeholders in January 2025~~ECC.<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)~~<br>~~National Grid will continue to engage with ECC on this matter.~~The final Landscape and Ecological Management Plan, which will require approval from the relevant planning authorities, will include habitat monitoring and management plans for each of the Environmental Areas. | ECC would encourage National Grid to ensure that BNG delivery is spatially aligned with Essex Local Nature Recovery Strategy (LNRS), ensuring that habitat creation and enhancement contribute to strategic ecological networks and priority areas identified within the LNRS.<br>ECC would recommend that offsite BNG proposals be co-developed with local stakeholders and LNRS delivery partners to ensure strategic alignment and long-term ecological value.<br>Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions.<br>Transparent accounting is required to distinguish between mitigation, enhancement, and compensation to avoid double-counting BNG.<br>~~Planning applications subject to mandatory BNG shall require a Habitat Management and Monitoring Plan to be submitted to and approved in writing by the local planning authority. To ensure that the net gain in biodiversity agreed upon in the Biodiversity Net Gain Plan shall be implemented in full within a 30-year period.~~<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~response to NGET's statement at Deadline 4 of the Examination.~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ECC recommends that the delivery of Biodiversity Net Gain is supported by a Habitat Management and Monitoring Plan to be secured through the Development Consent Order.. To ensure that the agreed net gain in biodiversity is implemented, monitored and maintained for a minimum period of 30-year period, in line with best practice and the Applicant's stated commitments. | |
| **Landscape and Visual** | | | | |
| 3.4.6 | Embedded mitigation (Landscape and Visual) | The Applicant acknowledges ECC's recommendation to use GI as a key component of landscape mitigation.<br>The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project.<br>The Applicant confirms that wider environmental and societal benefits will be considered and reported on in the Biodivesity Net Gain Report, delivered post-consent. | ~~In respect of Green Infrastructure:~~ ECC recommends that Green Infrastructure be used as a key component of landscape mitigation, particularly in areas of high visual sensitivity and community use. ECC supports the use of planting and habitat creation to soften visual impacts and enhance landscape character, and requests that GI proposals be aligned with LNRS priorities and local landscape strategies.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ ECC would welcome the opportunity for further discussion to explore how the Essex LNRS could be referenced as a | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances.<br>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in **Section 13.6** of **Chapter 13** (**Landscape and Visual**) of the **ES [APP-226]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project. | supplementary strategic evidence layer, alongside existing desk based and field survey data, to inform the identification and spatial alignment of mitigation, compensation and enhancement measures associated with the Project where relevant within Essex, and not solely in the context of off site BNG delivery | |
| 3.4.7 | Additional mitigation<br>(Landscape and Visual) | The Applicant acknowledges ECC's recommendation to explore a range of compensation measures to offset the impacts of the Project and deliver BNG.<br>The Applicant's BNG approach seeks to ensure that biodiversity creation and enhancement is delivered in the right places for nature, is aligned policy, and managed appropriately.<br>The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution | ~~In respect of Green Infrastructure:~~ ECC notes that significant residual landscape and visual impacts remain. ECC recommends that National Grid explore a range of compensation measures to offset the impacts of the proposal and deliver net environmental gain. These should include the enhancement of existing GI assets, investment in community-led landscape initiatives, and the creation of new accessible, high-quality GI open spaces across Essex. Such measures would contribute to improved | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate.<br>The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances.<br>The consideration of additional mitigation measures ~~are~~is presented in **Section 13.6** of **Chapter 13** (**Landscape and Visual**) of the **ES [APP-226]**. ~~Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~<br>Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project.<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~The Applicant's position on landscape mitigation and compensation is also set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. | environmental outcomes and support the wider objectives of nature recovery and community wellbeing. Discussions have taken place with Place Services, Essex Wildlife Trust, the Biodiversity Net Gain (BNG) Officer, and the Local Nature Recovery Strategy (LNRS) Coordinator to explore opportunities for securing potential compensation measures and financial contribution within Essex. ECC recommends securing off-site compensation within Essex, ideally in LNRS strategic habitat opportunity areas, and establishing long-term stewardship agreements with wildlife groups across Essex such as Essex Wildlife Trust, and ECC and other Local Authorities.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ ECC would also the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, alongside existing desk based and field survey data, to inform the identification and spatial alignment of mitigation, compensation and enhancement measures associated with the Project where relevant within Essex, and not solely in the context of off site BNG delivery. | |
| 3.4.8 | Outline LEMP (Landscape and | ~~The~~**7.4 Outline ~~LEMP [AS-046~~Landscape and Ecological Management Plan [REP3-030]** | In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from | Under ~~discussion~~Dis |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | Visual) | includes all relevant operational related mitigation measures specified in **Chapter 13** (**Landscape and Visual**) of the **ES [APP-226]** and is appropriate.<br>The Applicant's position on landscape compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. There has been no change in approach or shift in terminology from essential mitigation (necessary to further reduce significant environmental effects) to compensation (does not reduce or overcome an adverse effect) in the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** – latest version to be submitted at Deadline 3.<br>~~Meeting held in October 2024 to agree on the structure for the **Outline LEMP [AS-046]**.~~<br>~~Meeting held in March 2025 to discuss the second iteration of the **Outline LEMP [AS-046]**.~~<br>~~A further iteration of the **Outline LEMP [AS-046]** was issued in May 2025 following the meeting and feedback in writing.~~<br>ECC comments are noted, and National Grid will continue to engage with ECC on this matter. | "enhanced mitigation" to "landscape compensation" require clarification to ensure these are not repurposed mitigation measures, risking double-counting.<br>ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence.<br>ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.<br>~~As ECC only had sight of NGET's position on Green Infrastructure on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.~~ | cussion |

## 3.5 Contaminated Land, Geology and Hydrogeology

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.5.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in **Chapter 2 (Key Legislation** and **Planning Policy Context) [APP-126]** and **Section 9.2** of **Chapter 9 (Contaminated Land, Geology and Hydrogeology)** of the **ES [APP-181]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br><br>**Updated position (February 2026):**<br>Further discussion will take place following review of the Local Impact Report (LIR). National Grid will continue to engage with ECC on this matter. | No comments raised in the ECC relevant representations in relation to the policy legislation around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report. | Under discussion |
| **EIA – Approach and Methods** | | | | |
| 3.5.23.5.1 | Study area | The study area was agreed through the EIA**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** Opinion received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.5.3 | Data sources | Sufficient desktop and survey data has been | No comments raised in the ECC relevant | Under |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~collected to inform the assessment as presented within **Section 9.4 of Chapter 9 (Contaminated Land,** of the **Geology and Hydrogeology) ES [APP-181]**.~~<br><br>~~**Updated position (February 2026):**~~<br>~~Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.~~ | ~~representations in relation to the data sources around Hydrogeology, Geology and Contaminated Land. It is noted that further specific detail will be contained in the local impact report.~~ | ~~discussion~~ |
| ~~3.5.4~~3.5.2 | Assessment methodology | The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | ECC confirmed on 17 October in the review of the Statement of Common Ground that this matter has been appropriately dealt with therefore the status has been changed to agreed. | Agreed |
| ~~3.5.5~~ | ~~Key parameters and assumptions~~ | ~~Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in **Section 9.4** of **Chapter 9** (**Contaminated Land, Geology and Hydrogeology**) of the **ES [APP-181]**. The key parameters and assumptions presented are considered appropriate.~~<br><br>~~**Updated position (February 2026):**~~<br>~~Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.~~ | ~~No comments raised in the ECC relevant representations in relation to the Key Parameter and assumptions around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.~~ | ~~Under discussion~~ |
| ~~**EIA – Baseline Conditions**~~ | | | | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| 3.5.6 | Baseline conditions and receptors | The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in **Section 9.5** of **Chapter 9 (Contaminated Land, Geology and Hydrogeology)** of the **ES [APP-181]**. The baseline conditions and receptors presented are considered appropriate.<br><br>**Updated position (February 2026):**<br>Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter. | No comments raised in the ECC relevant representations in relation to the baseline conditions and receptors for Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report. | Under discussion |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.5.7 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in **Section 9.6** of **Chapter 9 (Contaminated Land, Geology and Hydrogeology)** of the **ES [APP-181]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br><br>**Updated position (February 2026):**<br>Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter. | No comments raised in the ECC relevant representations in relation to embedded mitigation for Hydrogeology, Geology and Contaminated Land. It is noted that further specific detail will be contained in the local impact report. | Under discussion |
| 3.5.8 | Standard mitigation | Standard mitigation measures to reduce potential effects during construction are summarised in | No comments raised in the ECC relevant representations in relation to the standard | Under discussion |

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~**Updated position (February 2026):**~~<br>~~Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.~~ | | |
| ~~3.5.11~~3. 5.3 | Operational (and maintenance) effects | The assessment of effects during operation (and maintenance) is presented in **Section 9.7** of **Chapter 9** (**Contaminated Land, Geology and Hydrogeology**) of the **ES [APP-181].** The assessment of effects during operation (and maintenance) presented is considered appropriate.<br>National Grid has considered these potential future mineral extraction sites as part of project development, including a revised design following consultation. This is addressed in the **2025 Design Development Report** [**APP-122]**, para 6.5.31.<br>~~**Updated position (February 2026):**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)~~<br>~~National Grid will continue to engage with ECC and the site operator as appropriate.~~ The Applicant is engaging with SRC Group regarding mineral sites A85 and A86, captured in **8.3.28 Draft Statement of Common Ground – Martells Mineral Site A85 & A86 [rep1-097]** submitted at Deadline 1. | ~~ECC provided the following details in their relevant representations dated 27th November 2025:~~<br>~~• From the evidence supporting the application, it is the case that the Applicant is relying on future conversations with existing and potential future mineral site operators to fully address operational matters. Of particular note with respect to Candidate Sites for potential future mineral extraction, Candidate Sites A85 and A86 are currently being assessed for future allocation as part of the ongoing Review into the Essex MLP. These sites are being promoted as an extension to an existing silica sand and sand and gravel mineral site. Silica sand is a rare and more valuable resource than 'standard' sand and it is from the part of the county represented by the proposed site extensions A85 and A86 where the only deposits of this mineral have been found. Whilst the recognition of impact on this nationally important (from the Mineral Products Associates (Industrial Sand) "It is recognised by government as an essential raw material of national importance and as such there is a requirement to provide an~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~adequate and steady supply, through maintaining stocks of permitted reserves and safeguarding silica sand resources") resource is welcomed, it is not explicitly stated whether the Candidate Sites are now effectively sterilised and therefore additional work will be required with the site promoters to understand whether the sites are still capable of being delivered as part of the emerging MLP (or otherwise) should the MWPA, following assessment, be minded to allocate either site as a Preferred Site~~<br>ECC's LIR **[REP1-161]** and ECC's response to the ExQ1 MW1.1 & MW1.2 **[REP3-078]** sets out the Councils position regarding the safeguarding of mineral deposits<br>The Applicants Mineral s Resource Assessment (APP-183) at Paragraph 9.5.17 confirms that the Order Limits and Study Area overlap with several Candidate sites that have been submitted for future allocation under the MWPA's Call for Sites for the emerging Essex Minerals Local Plan.<br>ECC recognises that engagement between the Applicant and existing and Candidate Site promoters is ongoing with discussions focussing on potential route variations to minimise or eliminate the sterilisation of permitted reserves, including alternative routes where Candidate Sites may be allocated as part of the ongoing Minerals Local Plan Review.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | | ~~not had sight of the National Grid's deadline 1 response.~~ As these discussions are ongoing, and the MWPA have not been provided with any finalised alternative route options, ECC cannot yet take a final view on potential impacts on the deliverability of existing allocations or Candidate Sites. As a result, this matter must remain Under Discussion. | |
| **~~Draft DCO / Outline Management Plans / Mitigation and Monitoring~~** | | | | |
| ~~3.5.12~~ | ~~Outline CoCP~~ | ~~The **Outline CoCP [APP-300]** includes all relevant construction mitigation measures specified in **Chapter 9** (**Contaminated Land, Geology and Hydrogeology**) of the **ES [APP-181]** and is appropriate for managing construction impacts from the Project.~~<br>~~A meeting was held in October 2024 to agree on the structure for the **Outline CoCP [APP-300]**.~~<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300]**.~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the meeting and feedback in writing.~~<br><br>~~**Updated position (February 2026):**~~<br>~~Further discussion will take place following review of the information within the LIR. National Grid will continue to engage with ECC on this matter.~~ | ~~No comments raised in the ECC relevant representations in relation to the Outline CoCP around Hydrogeology, Geology and Contaminated Land. It is noted in the relevant representations that further specific detail will be contained in the local impact report.~~ | ~~Under discussion~~ |
| **Other matters as required** | | | | |

## 3.6 Health and Wellbeing

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

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.6.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and **Section 10.2** of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192]**.<br>~~All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.~~<br>~~**Updated position (February 2026):**~~<br>Key regional and local policy relevant to health and wellbeing has informed the Health and Wellbeing assessment found in **ES Chapter 10 – Health and Wellbeing [APP-192]**. This includes the Joint Strategic Needs Assessments (JSNAs) and health and wellbeing strategies prepared by local authorities to identify local health priorities. The Essex Joint Health and Wellbeing Strategy is amongst those listed in Table 10.1 of **~~ES~~6.10 Environmental** | **May 2026**<br>~~Health and Wellbeing Chapter:~~<br>~~Section 10.2 of Chapter 10 of the PEIR states that local policy, specific to Health and Wellbeing will include local authorities and Integrated Care Boards Joint Strategic Needs Assessments (JSNA) and Health and Wellbeing Strategies.~~<br>~~Reference to the Southend, Essex and Thurrock Mental Health Strategy should also be considered in the policy context linking into assessment of mental health impacts.~~<br>~~As part of the Statutory Consultation, ECC Public Health response to the PEIR, reference to the localised health and wellbeing strategies is also recommended.~~<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• Table 10.1 (APP-192) of the ES omits reference to local health and wellbeing strategies and Integrated Care System~~ | ~~Under discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Statement Chapter 10 (- Health and Wellbeing) [APP-192]. Health priorities common across local health and wellbeing strategies reviewed include tackling health inequalities, supporting mental wellbeing and enabling healthier, more active communities, as demonstrated in Table 10.1 of ES6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192]. | Joint Forward Plans. This weakens alignment with local policy objectives and the Essex Joint Health and Wellbeing Strategy, which focus on tackling inequalities, supporting mental wellbeing and enabling healthier, more active communities<br>• As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the ExaminationFollowing a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| **EIA – Approach and Methods** | | | | |
| 3.6.2 | Study area | The study area was agreed through the EIA6.19 **Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.6.3 | Data sources | Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) of the ES [APP-192]**.<br>National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024.<br>ECC response to the technical note was | Health and Wellbeing Chapter:<br>An additional technical note for health and wellbeing (November 2024) refreshed approach has been produced and should be referenced here.<br>Clarification is required on use of 'Indices of Deprivation', will this look at the overall measure of deprivation along the route or will it focus domains of deprivation as part of | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025.National Grid can confirm that the baseline section of the ES chapter includes reference to the Index of Multiple Deprivation (IMD). The approach to defining ward sensitivity has used a variety of baseline data, including the IMD but also other health-related indicators.<br>National Grid can confirm that published local position statements such as the Essex Joint Health and Wellbeing Strategy have been included within ~~the~~**6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192]**. | defining sensitivity.<br>ECC confirmed in an email dated 30 January 2026 from the public health team that this matter has been resolved and the position can be agreed. | |
| 3.6.4 | Assessment methodology | A meeting was held on 24 September 2024 to agree the assessment methodology of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192].**<br>Comments were received on the Technical Note from ECC on 01/11/2024 and a response was provided in May 2025.<br>**~~Updated position (February 2026):~~**<br>Comments made by ECC in their relevant representation are noted, and National Grid will continue to engage with ECC on this matter. National Grid's position to each of the points raised is as follows:<br>• A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in | As part of the Statutory Consultation, ECC Public Health highlighted the need for a more robust health impact assessment and the need for National Grid to focus on actively driving out maximum local benefits to the health and wellbeing of communities across Essex.<br>Following a review of the Applicants' response to ECC's RR **[RR-1083],**<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• The overarching National Policy Statement for Energy (EN-1) requires that Environmental Statements identify and mitigate adverse health impacts arising from energy infrastructure, including~~ | ~~Under discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | 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.<br>• **~~ES~~6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**contains an assessment of impacts on vulnerable groups. Vulnerable groups considered in the assessment are identified in Table 10.5 of **~~ES~~6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**.<br>National Grid provided a response to this matter at Deadline 1 through ~~the relevant representations process (document reference 8.4.1)~~**8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. | ~~cumulative effects and impacts on vulnerable groups. It also expects applicants to consider indirect health impacts such as access to open space, active travel and community wellbeing. ECC considers that the ES does not yet meet these expectations. The Health and Wellbeing chapter (APP-192) does not provide any view on cumulative health effects as required under EN-1.~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive t response to NGET's statement at Deadline 4 of the Examination.~~<br>~~ECC has not had sight of the National Grid's deadline 1 response so is unable to respond.~~<br>LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| 3.6.5 | Key parameters and assumptions | Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192]**. The key parameters and assumptions presented are considered appropriate. | Key parameters presented in the PEIR are considered appropriate at a population level, consideration of vulnerable groups and the application of a precautionary principle.<br>As with the revised health and wellbeing approach, use of the Welsh Health Impact Assessment Support Unit (WHIASU) | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024.<br>ECC response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025.<br>ECC comments are noted, and NG will continue to engage with ECC on this matter.<br>~~**Updated position (February 2026):**~~ In relation to the points raised in ECC's relevant representation dated 27 November 2025:<br>• The assessment undertaken in ~~Chapter 10: Health and Wellbeing of the ES (~~**6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**~~)~~ reported the available IMD data at the time (i.e. 2019) in order to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. We have also reviewed deprivation data for the health deprivation and disability domain at LSOA level, as set out in paragraph 10.5.18 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. A review of the updated IMD data published in October 2025 (after the DCO application was submitted) shows that, for Greater Essex, more people are living in deprived areas in 2025 than was the case in 2019 (although for some areas such as Colchester, deprivation levels do not appear to have changed significantly over | guidance is recommended to inform the identification of vulnerable population groups is recommended. The refreshed approach to Health and Wellbeing should be referenced here.<br>ECC provided the following details in their relevant representation dated 27 November 2025:<br>• The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently.<br>**May 2026**<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | the same time period). It is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment; impacts on vulnerable populations (which includes people both within and outside of deprived areas) have already been taken into account in the assessment. | ~~comprehensive response to NGET's statement at Deadline 4 of the Examination~~ECC notes National Grid's acknowledgment that the 2025 IMD update shows that for Greater Essex, more people are living in deprived areas in 2025 than in 2019 . A meeting held with the Applicant on 23.04.2026 confirmed a supplementary section of the ES is to be provided for further review | |
| **EIA – Baseline Conditions** | | | | |
| 3.6.6 | Baseline conditions and receptors | The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192]**. The baseline conditions and receptors presented are considered appropriate.<br>ECC comments are noted, and NG will continue to engage with ECC on this matter.<br>**~~Updated position (February 2026):~~**<br>In relation to points raised in ECC's relevant representation dated 27 November 2025:<br>• The point relating to IMD data has been addressed earlier in relation to ~~ID3.5.5~~ID 3.6.5 and is not repeated here.<br>• The point relating to the Joint Health and Wellbeing Strategy has been addressed earlier in relation to ~~ID3.5.1~~ID 3.6.1 and is not repeated here. | ~~The key information sources outlined in section 10.5.4 are considered appropriate.~~<br>~~Use of IEMA guidance on determining significance for Human Health and Effective Scoping of Human Health in EIA.~~<br>~~The additional guidance noted in the refreshed technical note for health and wellbeing, Welsh Health Impact Assessment Support Unit (WHIASU) is considered to be an appropriate approach for the identification of vulnerable groups is considered appropriate.~~<br>~~Use of the Mental Wellbeing Impact Assessment is considered an appropriate approach for assessing the impacts on people's mental wellbeing in relation to control, resilience and community assets and participation and inclusion in the context of the wider determinants of mental well-being, ensuring this also links to the above population characteristics and sensitive receptors as outlined above.~~ | ~~Under discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~ECC requests whether there is any updated guidance as the above mentioned is from 2011.~~<br>~~ECC requests that NG refer to the Southend, Essex and Thurrock Mental Health Strategy.~~<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently. 6.8.6.~~<br>~~• Table 10.1 (APP-192) of the ES omits reference to local health and wellbeing strategies and Integrated Care System Joint Forward Plans. This weakens alignment with local policy objectives and~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~the Essex Joint Health and Wellbeing Strategy, which focus on tackling inequalities, supporting mental wellbeing and enabling healthier, more active communities.~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~Following a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.6.7 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>**~~Updated position (February 2026):~~**<br>In relation to points raised in ECC's relevant representation dated 27 November 2025:<br>• No significant health and wellbeing impacts have been identified in the assessment set out in **~~ES~~6.10 Environmental Statement Chapter 10~~:~~ - Health and Wellbeing** | Embedded measures relevant to the Health and Wellbeing Chapter which are intrinsic to and build into the design of the project are considered appropriate and adequate.<br>~~However, will need to account of and be informed by full ES which includes the refreshed approach to Health and Wellbeing Assessment.~~<br>**May 2026**<br>ECC acknowledges National Grid's commitment to add additional wording to the Outline CoCP. Appendix E (APP-305) requiring a detailed Communications Strategy to be put in place for the duration of the construction phase. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | **[APP-192]** and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through making timely design decisions and engaging with the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through the use of a dedicated project phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.<br>In recognition of concerns relating to anxiety and uncertainty about the scale and duration of construction, the following additional wording will be added to **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]**:<br>• ~~National Grid will continue to engage with ECC on this matter.~~The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local | ~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.~~<br>~~Refer to our Relevant Representation dated 27 November 2025 (RR-1083)~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~This matter can be moved to agreed, subject to confirmation that the Communications Strategy requirement in the final CoCP will explicitly require: (a) advance notification of disruptive activities to affected | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice. | communities; (b) a formal complaints handling process with defined response times and escalation routes; and (c) accessible communication options for residents experiencing digital exclusion (paper copies, community notice boards). | |
| 3.6.8 | Standard mitigation | Standard mitigation measures to reduce potential effects during construction are summarised in **Section 10.6** of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~), of the ES~~ [APP-192]** and set out in ~~the~~**7.2 Outline ~~CoCP~~ ~~[APP-300~~Code of Construction Practice [REP3-025]** . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~**Updated position (February 2026):**~~<br>In relation to points raised in ECC's relevant representation dated 27 November 2025:<br>• The point relating to health and wellbeing monitoring has been addressed earlier in relation to ~~ID3.5.7~~ID3.6.7 and is not repeated here.<br>A number of the measures requested by ECC have already been included in the submission documents. Examples include good practice relating to dust suppression as set out in **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]**.<br>**6.7 Environmental Statement Chapter 7 – Air** | **May 2026**<br>~~Standard~~ECC note that standard mitigation ~~measures relevant to~~for health and wellbeing ~~are considered appropriate and adequate to address potential effects, however, will need to take account of and be informed by the baseline conditions, mental health impact assessment as noted above in the ES.~~ relies on commitments distributed across multiple ES Chapters (Air Quality, Noise and Vibration, Traffic and Transport) rather than being consolidated in Chapter 10. This makes it difficult to assess whether the totality of health-protective measures is adequate.<br>ECC has requested that the final CoCP include a dedicated section on health and wellbeing mitigation. This section should consolidate all health-relevant commitments, including noise management, dust suppression, PRoW management, and community liaison, and cross-reference monitoring framework.<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• The ES concludes that no additional~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | **Quality [APP-147]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** conclude that with appropriate application of dust mitigation there would likely be no significant effect to human health from construction dust.<br>~~National Grid will continue to engage with ECC on this matter.~~**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** includes the assessment of the potential impacts of the Project including changes in traffic flow, delays, road safety and impact on walking, cycling and horse-riding modes on the roads along the Primary Access Routes located in the Local Road Network that would access the haul roads to construction sites. **7.11 Transport Assessment [APP-333]** examines capacity, safety and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Within the assessment of the relevant Environmental Statement chapters and the Transport Assessment, mitigation measures are proposed to minimise likely adverse impacts. | ~~mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~At a meeting held 23.04.2026, the Applicant confirmed that a dedicated health and wellbeing section will be developed bringing together key commitments from other technical chapters. This matter can be moved to agreed, upon receipt of written confirmation within the oCoCP. | |
| 3.6.9 | Additional mitigation | The consideration of additional mitigation measures are presented in Section 10.6 of **Chapter 10** (**Health and Wellbeing**), of the **ES [APP-192]**. Additional mitigation is considered | **May 2026**<br>~~**Health and Wellbeing Chapter:**~~<br>~~It is noted that the PEIR has not identified any requirements for additional mitigation for~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>ECC comments are noted, and NG will continue to engage with ECC on this matter.<br>~~**Updated position (February 2026):**~~<br>In relation to points raised in ECC's relevant representation dated 27 November 2025:<br>• The point relating to IMD data has been addressed earlier in relation to ~~ID3.5.7~~ID 3.6.7 and is not repeated here. | ~~Health and Wellbeing at this stage, this should be revisited once the above refreshed health and wellbeing assessment approach is undertaken within the ES, including the Mental Health Impact Assessment approach that will seek to assess the mental health impacts according the four protective factors; enhancing control, increasing resilience, facilitating participation, promoting social inclusion.~~<br>~~Additional mitigation measures highlighted in LV10 highlighted that draft Order Limits could include adequate room for planting and potentially mounding for additional screening.~~<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~<br>~~• The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~communities.~~<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~The point relating to mitigation is addressed above 3.6.8 | |
| **EIA – Assessment Conclusions** | | | | |
| 3.6.10 a | Construction effects | The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The assessment of effects during construction presented is considered appropriate. | It is noted that mental health and wellbeing may also be impacted by residents experiencing anxiety in relation to air quality effects. However, with the mitigation measures identified, the residual effects of the Project in relation to Health and Wellbeing for both the general population and for vulnerable groups is considered to be neutral and not significant. This will need to be informed by the refreshed approach to health and wellbeing assessment in the revised technical note.<br>It is also noted that mental health and wellbeing may be impacted in relation to effects on visual amenity during construction. However, effects are considered to be temporary, and the location of impacted population would change throughout the construction period due to the linear nature of the Project.<br>Relevant mitigation includes community liaison measures to inform residents of construction activities. As noted in the revised | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | health and wellbeing technical note, the effects would need to assess sensitivity of receptors across the linear project, magnitude of effect in relation to mental health and wellbeing. This should also include qualitative assessment of the anticipated mental health and wellbeing impacts as noted within the revised approach and should provide the opportunity to input qualitative information to co-produce mitigation measures to offset the anticipated mental health impacts from the project which is one of the listed protective factors within the assessment "facilitating participation".<br>It is noted preliminary residual effects of the Project in relation to Health and Wellbeing is potentially negative during construction due to changes in travel choice and potential effects on journey times and distances in particular for those accessing healthcare facilities. Though considered to be not significant, further assessment and mitigation measures should be provided in the ES according to the revised health and wellbeing assessment approach.<br>May 2026<br>Following meeting held with the Applicant on 23.04.2026 and a review of the Applicants' response to ECC's RR **[RR-1083]**, LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| 3.6.10 | Construction | In relation to points raised in ECC's relevant | ECC provided the following details in their | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| b | effects | representation dated 27 November 2025:<br>• ~~The Consultation Report (~~**5.1 Consultation Report ~~(Final Issue A)~~ [APP-066]**~~)~~ sets out the approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom English may be a second language. The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation (SoCC), giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means. Appendix E - Community Engagement and Public Information of ~~the~~**7.2 Outline Code of Construction Practice [~~APP-305~~REP3-025]** sets out the communications channels and approach to community engagement during the construction of the Project, including the approach to engaging with local communities. | relevant representation dated 27 November 2025:<br>• ~~-~~EN-1 emphasises the need to assess potential impacts on vulnerable groups within society. The ES baseline data acknowledges that sections of the population along the project corridor do not speak English as their main first language, yet this vulnerability has not been considered within the sensitivity assessment or mitigation planning. Communities with limited English proficiency may face barriers to understanding consultation materials, receiving construction updates, or engaging with health information - leading to heightened anxiety and exclusion from mitigation measures. ECC recommends that the Applicant adopt inclusive engagement methods, including translated materials, interpreters, and collaboration with local community and faith organisations. These measures would align with EN-1's requirement to take opportunities to promote local improvements to encourage health and wellbeing, especially for groups who may be differentially affected by the development.<br>**May 2026**<br>Following a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| 3.6.10 | ~~The~~ | • We recognise that people may have | ECC provided the following details in their | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| c | ~~assessment of~~Construction effects ~~during construction is presented in **Section 10.7 of Chapter 10 (Health and Wellbeing) of the ES [APP-192].** The assessment of effects during construction presented is considered appropriate.~~<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated position (February 2026):**~~ | concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. 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.<br>• We understand that uncertainty while the Project is developed may cause anxiety. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including use of a dedicated phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.<br>~~It is noted that mental health~~Impacts on community safety (traffic) have been assessed | relevant representation dated 27 November 2025:<br>• EN-1 (paragraph 4.4.5) requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Many Essex communities, particularly in Tendring, will experience overlapping NSIPs and growth schemes. The ES does not sufficiently consider the compounded psychological stress of multiple construction projects and landscape change. 32 6.8.10.<br>ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed<br>**May 2026**<br>~~As ECC only had sight~~Following a review of ~~NGET's Updated position (February2026) on 20 February 2026~~the Applicants' response to ECC's RR **[RR-1083]**, ~~with limited time to respond~~LIR **[REP1-161]** and Written responses (REP2-023, ~~ECC reserves the opportunity~~REP2-030 and REP2-029), this | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | in **6.10 Environmental Statement Chapter 10 – Health** and ~~wellbeing may also be impacted by residents experiencing anxiety~~**Wellbeing [APP-192]** in relation to ~~air quality effects. However, with~~ the ~~mitigation measures identified,~~potential for increases in traffic on the ~~residual effects~~road network which could increase risk to users of the ~~Project~~roads, including pedestrians and cyclists. Impacts associated with reduced active travel have been considered in relation to physical activity and the potential for disruption to PRoWs or areas of open space which may affect opportunities for physical activity. Health impacts associated with amenity loss from construction activities (noise and dust) are described in **6.10 Environmental Statement Chapter 10 –** **Health and Wellbeing** ~~for both the general population and for vulnerable groups is considered~~**[APP-192]** paragraphs 10.7.12 to ~~be neutral~~10.7.20 and ~~not significant. This will need~~10.7.3 to ~~be informed by the refreshed approach~~10.7.11 respectively; health effects arising from changes in accessibility to social infrastructure are set out in paragraphs 10.7.47 to 10.7.62); health effects arising from disruption to walking and cycling routes and areas of open space during construction are described in paragraphs 10.7.86 to 10.7.187. No significant effects have been identified for health and wellbeing ~~assessment in the revised technical note.~~<br>~~It is also noted that mental health and wellbeing may be impacted~~ in relation to ~~effects on visual amenity during construction~~these aspects.~ | issue can be moved to ~~provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~agreed.<br><br>~~Under discussion~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~However, effects are considered to be temporary, and the location of impacted population would change throughout the construction period due to the linear nature of the Project.~~<br>~~Relevant mitigation includes community liaison measures to inform residents of construction activities. As noted in the revised health and wellbeing technical note, the effects would need to assess sensitivity of receptors across the linear project, magnitude of effect in relation to mental health and wellbeing. This should also include qualitative assessment of the anticipated mental health and wellbeing impacts as noted within the revised approach and should provide the opportunity to input qualitative information to co-produce mitigation measures to offset the anticipated mental health impacts from the project which is one of the listed protective factors within the assessment "facilitating participation".~~<br>~~It is noted preliminary residual effects of the Project in relation to Health and Wellbeing is potentially negative during construction due to changes in travel choice and potential effects on journey times and distances in particular for those accessing healthcare facilities. Though considered to be not significant, further assessment and mitigation measures should be provided in the ES according to the revised health and wellbeing assessment approach.~~ | | |
| 3.6.11 | Operational | The assessment of effects during operation (and | Health and Wellbeing Chapter: | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| a | (and maintenance) effects | maintenance) is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~) of the ES~~ [APP-192].**<br>**~~Updated position (February 2026):~~**<br>Chapter 10 sets out the assessment of impacts as they relate to both physical and mental health and wellbeing, noting that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would ~~bring~~ bring**6.10 Environmental Statement Chapter 10 ~~(~~- Health and Wellbeing~~)~~ [APP-192]** identifies that, whilst there are likely to be individuals who experience adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. This draws on findings presented in **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~)~~ [APP-226]** and specifically the conclusions within **6.13.A4 Environmental Statement Appendix 13.4~~:~~ - Residential Visual Amenity Assessment ~~(RVAA)~~ [APP-233 and APP-234]** which finds no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live. It is noted within the Residual Visual Amenity Assessment (RVAA) that some properties / property groups do come close to this threshold and that mitigation measures have been recommended to reduce | Significant negative effects on landscape character during operation (and maintenance) are predicted to extend across the draft Order Limits and the surrounding landscapes within approximately 0.5 km to 1 km of the project.<br>Similarly, significant negative effects on views and visual amenity during operation (and maintenance) are predicted to be experienced within approximately 1 km to 2 km of the project and these are likely to be experienced by a range of visual receptors including residents, road users and recreational receptors. It is understood that response of the local communities to these aspects are subjective, and effects are likely to be experienced by a proportion of the local population due to how the Project may impact setting of homes, businesses and or culturally or ecologically important community assets. Further assessment undertaken and presented in the ES should also draw from the mental health and wellbeing assessment approach within the refreshed approach to health and wellbeing assessment technical note which will include a qualitative aspect.<br>**May 2026**<br>Following a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | effects | | |
| 3.6.11 b | Operational (and maintenance) effects | In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will engage with host authorities to inform the content of the Employment and Skills Plan.<br>The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.<br>With regards to visual effects, the LVIA presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most | As part of the Statutory Consultation, ECC Public Health highlighted the need to consider how significant negative impacts could be off set through positive community benefits for local communities within Essex, such as funding for community energy schemes, training, and skills investment within the local area for those adversely affected by the Project particularly in areas with high levels of deprivation.<br>There is the opportunity to push for the creation of accessible green spaces providing benefits for health and wellbeing and enhancing biodiversity and local nature recovery.<br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• The project will have clear and extensive residual impacts that will adversely affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Furthermore, ECC contends that while the Norwich to Tilbury project will deliver 50 significant benefits at a national level, this will not offset the harm at the local level. This is not acceptable to ECC. ECC is therefore of the opinion, that the Norwich to Tilbury project should deliver significant beneficial~~ | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | landscape and visual receptors within the study area are static, and so will experience effects across the more localised areas explained in the LVIA. For example, a recreational receptor within a certain park or street will only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the project as a whole. The total visual effects of the project as a whole will be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case landscape character areas or types). Again, they will not typically be experienced as a whole, but the total effect on landscape character can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.<br>~~National Grid will continue to engage with ECC on this matter.~~ | ~~socio-economic effects to the host communities, to offset impacts. It however, is concerned this issue and especially the associated social value opportunities around skills, training, and future employment, have not been fully assessed by the Applicant and needs to be as a matter of priority~~<br>• ~~The ES acknowledges that the proposals will have a significant negative landscape impact at both construction and operational stages over the length of the project. Where negative effects are judged not to be significant further away from the project line, the visual character of the landscape and its perceptual nature, is likely to combine to significantly negatively affect the landscape over a wide area, reducing scenic beauty and tranquillity, aesthetic enjoyment, a sense of place, history and identity, and inspiration for learning throughout the landscape and visual study area~~<br>• ~~With regards to visual effects, the ES acknowledges that the proposals will have a significant negative visual impact over the length of the project. This is identified as up to 1.5Km from the project line in most situations. Generally, beyond 1.5Km it is accepted that individual impacts will not be significant. However, as a result of open landscapes, multiple 33 pylons in view and cumulative effects when passing~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~from one visual receptor area to another, ECC considers that the cumulative impact is likely to result in an overall significant adverse effect generally within the study area during both the construction and operation stages.~~<br>**May 2026**<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026~~Following a review of the Applicants' response to ECC's RR **[RR-1083]**, ~~with limited time to respond~~LIR **[REP1-161]** and Written responses (REP2-023, ~~ECC reserves the opportunity to provide a comprehensive response~~REP2-030 and REP2-029), this issue can be moved to ~~NGET's statement at Deadline 4 of the Examination~~agreed.<br>~~Under discussion~~ | |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.6.12 | Outline CoCP | ~~The~~**7.2 Outline** ~~CoCP~~**Code of Construction Practice [REP3-025]** includes all relevant mitigation measures specified in **Chapter 10** (**Health and Wellbeing**), of the **ES [APP-192]** and is appropriate for managing construction impacts from the Project.<br>~~A meeting was held in October 2024 to agree on the structure for the **Outline CoCP [APP-300]**.~~<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300]**.~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the~~ | Health and Wellbeing Chapter:<br>Note comments above for embedded, standard and additional mitigation measures which are applicable to the CoCP.<br>Table 5.1 in the CoCP to include a section for construction and operation phase management phase in relation to health and wellbeing taking account of the refreshed approach to health and wellbeing assessment approach. This is currently referred to in section 5.1.11 of the outline CoCP has not been provided its own section in table 5.1.<br>Refer to our ~~Relevant Representation dated~~ | ~~Under Discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~meeting and feedback in writing.~~<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~<br>**~~Updated position (February 2026):~~**<br>~~National Grid~~The Applicant provided a response to this matter at Deadline 1 through ~~the relevant representations process (document reference 8.4.1)~~**8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**<br>The Applicant has further updated **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** at Deadline 3 with additional wording relating to the requirement for a detailed Communications Strategy as a result of community anxiety and uncertainty about the scale and duration of construction activities. | ~~27 November 2025 (RR-1083)~~Relevant Representation dated 27 November 2025 (RR-1083).<br>**May 2026**<br>Matter addressed above at 3.6.8<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~Following a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses (REP2-023, REP2-030 and REP2-029), this issue can be moved to agreed. | |
| **Other matters as required** | | | | |

## 3.7 Historic Environment

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.7.1 | Policy and legislation (Archaeology) | The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 (~~-~~ Key | ECC (Archaeology) ~~is currently reviewing the relevant documentation. The~~has reviewed ES Chapter 11.2 ~~looks to contain~~and can confirm it contains all relevant legislation, policy and | ~~Under discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | **Legislation and Planning Policy Context~~)~~ [APP-126]** and **Section 11.2** of **Chapter 11** (**Historic Environment**) of the **ES [~~APP-208~~AS-068]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br>Further discussion will take place following review of the information within the LIR. ~~National Grid will continue to engage~~The Applicant is planning to meet with ECC ~~on this matter~~in April/May 2026. | guidance~~. Further information will be included in the LIR~~. | |
| 3.7.2 | Policy and legislation<br>(Built Heritage) | The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 (~~-~~ Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 11.2 of **6.11 Environmental Statement Chapter 11 ~~(-~~ Historic Environment~~) of the ES [APP-208~~ [AS-068]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br>~~National Grid~~The Applicant notes the LPA's request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with the **Scoping Report [APP-288 – APP-296]**, **Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment** | ECC (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: **6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209]** we are able to agree this matter. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | [~~APP-208~~AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The Applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets. | | |
| **EIA – Approach and Methods** | | | | |
| 3.7.3 | Study area | The study area was agreed through ~~the EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.7.4 | Data sources (Built Heritage) | Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11** | ECC (Built Heritage) confirm that this matter is agreed. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | **Environmental Statement Chapter 11 (- Historic Environment) of the ES [APP-208] [AS-068].**<br>**Updated position (February 2026):**<br>Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. **Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains. | | |
| 3.7.5 | Data sources (archaeology) - Desktop | Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [APP-208] [AS-068].** | ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026). | Agreed |
| 3.7.6 | Data sources (archaeology) – survey data | Sufficient survey data has been collected to inform the assessment as presented within **Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208].** | ECC notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. This matter remains under discussion. It is understood that the | Under discussion Not Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083],** of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey.<br>The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP 328]**.<br>~~National Grid will continue to engage with ECC on this matter.~~The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary | outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has bene provide by the Applicant to inform an appropriate assessment of the proposed development. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. | | |
| 3.7.7 | Assessment methodology (Built Heritage) | The methodology for assessing Historic Environment was agreed through ~~the EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.<br>~~National Grid~~The Applicant position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation) above. | Email ~~4~~4th4 Nov 2024 - Built heritage – consultant's methodology not agreed, and all assets affected not identified.<br>ECC (Built Heritage) is in agreement with this matter. | Agreed |
| 3.7.8 | Assessment methodology (Archaeology) | The methodology for assessing Historic Environment was agreed through the ~~EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | ECC is in agreement with this matter. | Agreed |
| 3.7.9 | Key parameters and assumptions (Built Heritage) | Key parameters and assumptions associated with the Historic Environment assessment are summarised in **Section 11.4** of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208 [AS-068]~~**. The key parameters and assumptions presented are considered appropriate.<br>February 2025, ~~National Grid~~the Applicant issued Historic Environments (HE) Viewpoints | ECC (Built Heritage) is in agreement with the matter following review of the ES. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | information and held a thematic group meeting on the topic.<br>March 2025, ~~National Grid~~the Applicant issued an updated version of the Historic Environment (HE) Viewpoints information. | | |
| 3.7.10 | Key parameters and assumptions (Archaeology) | Key parameters and assumptions associated with the Historic Environment assessment are summarised in **Section 11.4** of **6.11 Environmental Statement Chapter 11 ~~(~~-Historic Environment~~)~~ of the ~~**ES [APP-208] [AS-068]**~~**. The key parameters and assumptions presented are considered appropriate.<br>~~February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic.~~<br>The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083],** of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further | ECC ~~(Archaeology) is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "*The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.*"~~notes the fieldwork proposed prior to application has not been completed. It is understood that the outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has bene provide by the Applicant to inform an appropriate assessment of the proposed development | Not Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey.<br>The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP 328].**<br>~~March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information and will continue to engage with ECC on this matter.~~The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. | | |
| **EIA – Baseline Conditions** | | | | |
| 3.7.11 | Baseline conditions and receptors (Built Heritage) | The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208~~ **[AS-068]**. The baseline conditions and receptors presented are considered | ECC (Built Heritage) is in agreement with this matter. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | appropriate<br>February 2025, ~~National Grid~~The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.<br>Further detail relevant to this section are outlined in section 3.6.4 (Data Sources). | | |
| 3.7.12 | Baseline conditions and receptors (Archaeology) | The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208~~ [AS-068]**. The baseline conditions and receptors presented are considered appropriate.<br>~~**Updated position (February 2026):**~~<br>February 2025, ~~National Grid~~The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic. | ECC agreed this matter during call in January 2026. | Agreed |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.7.13 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in **Section 11.6** of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208~~ [AS-068]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>April 2025, ~~National Grid~~The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project. | ECC (Archaeology) agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is most relevant in areas of underground cable where there will be an impact on archaeological remains.<br>Further time is needed to review **5.15 Design Development Report [APP-122]** but we note this refers only to changes requested to the | Not Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~**Updated position (February 2026):**~~<br>~~Matter remains under discussion for archaeology. National Grid~~The Applicant will continue to engage with ECC on this matter. | route alignment which were made before the final ES.<br>As a result, and noting the intrusive archaeological fieldwork proposed prior to application is unlikely to be completed, before the end of the examination, ECC cannot agree that sufficient archaeological survey data will have been provided by the Applicant to inform an appropriate assessment of the proposed development. | |
| 3.7.14_a | Standard mitigation (Built Heritage) | Standard mitigation measures to reduce potential effects during construction are summarised in **Section 11.6** of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES~~ [~~APP-208~~AS-068]** and set out in the **7.2 Outline ~~CoCP~~ Code of Construction Practice[~~APP-300~~REP3-025] .** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~**Updated position (February 2026):**~~<br>Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management Pan [~~AS-046~~REP3-030]**. Specifically, this means: | This matter is agreed with regards to commitment H06. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature<br>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists<br>Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible<br>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced. | | |
| 3.7.14 b | Standard mitigation (Built Heritage) | Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be | Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) ~~we~~ECC would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | appropriate. ~~National Grid~~<br>As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** a community relations team will ~~continue~~be appointed to engage with ~~ECC on this matter~~local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. | the monitoring of effects.<br>~~Under discussion~~ | |
| 3.7.15 | Standard mitigation (Archaeology) | Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~)~~ of the ~~ES~~ ~~[APP-208 [AS-068]~~** and set out in the **7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]~~]~~.** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | ECC (Archaeology) agreed this matter during call held January 2026. | Agreed |
| 3.7.16 | Additional mitigation | The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~)~~ of the ~~ES [APP-208 [AS-068]~~**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation.<br>ECC noted during call in January 2026 that | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~**Updated position (February 2026):**~~<br>~~Matter will remain under discussion for archaeology until the outline AMS WSI is finalised.~~The Applicant is currently preparing an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review. | this matter is not relevant for Built Heritage.<br>This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** which is scheduled for submission at Deadline 5 | |
| **EIA – Assessment Conclusions** | | | | |
| 3.7.17 | Construction effects (Built Heritage) | The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208 [AS-068]~~**. The assessment of effects during construction presented is considered appropriate. | ECC (Built Heritage) are in agreement with this matter. | Agreed |
| 3.7.18 | Construction effects (archaeology) | The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~) of the ES [APP-208 [AS-068]~~**. The assessment of effects during construction presented is considered appropriate. | This section is currently under review (ECC Archaeology)<br>Email ~~4th~~4 Nov 2024 - Archaeology – consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission.<br>Email ~~6th~~6 Nov 2024 – further discussion required regarding vibration assessments.<br>Following review of the ES, ECC (Archaeology) confirmed agreement on this matter during call in January 2026. | Agreed |
| 3.7.19 | Operational | The assessment of effects during operation | This matter is agreed for Tendring, Braintree, | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | (and maintenance) effects (Built Heritage) | (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~)~~ ~~of the~~ ~~**ES [APP-208 [AS-068]**~~.** The assessment of effects during operation (and maintenance) presented is considered appropriate. | Brentwood, Basildon and Colchester. | |
| 3.7.20 | Operational (and maintenance) effects (archaeology) | The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~)~~ ~~of the~~ ~~**ES [APP-208 [AS-068]**~~.** The assessment of effects during operation (and maintenance) presented is considered appropriate. | Following review of the ES, ECC confirmed agreement on this matter during call in January 2026. | Agreed |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.7.21 | Outline CoCP | The **7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [[REP3-025]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11 ~~(~~- Historic Environment~~)~~ ~~of the~~ ~~**ES [APP-208**~~ [AS-068]** and is appropriate for managing construction impacts from the Project.<br>~~A meeting was held in October 2024 to agree on the structure for the **Outline CoCP [APP-300].**~~<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300].**~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the meeting and feedback in writing.~~<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated position (February 2026):**~~ | ~~Concern that the CoCP does not acknowledge the potential impacts to built heritage during the construction phase and makes reference only to the how the project may affect the historic environment through disturbing known and unknown archaeology and the removal of historic landscape feature.~~<br>~~This section is currently under review (ECC Archaeology). Further comments will be included within the LIR which require action.~~<br>~~For ECC (Built Heritage) See 3.6.14 Standard mitigation (Built Heritage) for current position.~~It is noted that Commitment H06 in **7.2 Outline Code of Construction Practice [REP3-025]** has been updated to reflect wording requested by ECC. ECC can confirm this issue is now agreed | ~~Under discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | See 3.6.14 and 3.6.15 for current position.<br>Commitment H06 in **7.2 Outline Code of ~~Discussion will be progressed following review of the LIR. National Grid will continue to engage with ECC on this matter.~~Construction Practice [ REP3-025]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed. | | |
| 3.7.22 | Environmental Actions and Commitments | Section 9.8 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]** already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement.<br>Commitment H06 in **7.2 Outline Code of ~~Mitigation measures/ environmental commitments will be highlighted in the Outline CoCP.~~Construction Practice [REP3-025]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed. | ~~ECC (Archaeology) considers further actions are required within the OCEMP to ensure potential effects are considered. This will be expanded upon in the forthcoming Local Impact report.~~<br>~~ECC position pending sight of the REAC.~~In light of the changes made to the oCOCP in line with wording suggested by ECC, this can now be moved to agreed | ~~Under discussion~~Agreed |
| **Other matters as required** | | | | |
| 3.7.23 | Overarching Written Scheme of Investigation (WSIs) for pre-consent | ~~**Updated position (February 2026):**~~<br>~~National Grid~~The Applicant shared overarching WSIs in March – June 2024 and December 2024.<br>The scope and methodology of the overarching | The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | geophysical surveys and archaeological trial trenching. | WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. | | |
| 3.7.24 | Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching. | ~~**Updated position (February 2026):**~~<br>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.<br>There are still addenda to site specific WSIs forthcoming that have yet to be issued. | The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. | Agreed |
| 3.7.25 | Outline Archaeological Mitigation Strategy and Outline WSI. | The contents of the **7.5 Outline Archaeological Mitigation Strategy and Outline ~~WSI (AMS-OWSI)~~Written Scheme of Investigation [APP-328]** is considered appropriate and proportionate to the level of evaluation required.<br>~~National Grid~~The Applicant issued the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) for the post-consent stage of the project in April 2025.<br>~~**Updated position (February 2026):**~~<br>~~Discussion will be progressed following review of the LIR. National Grid will continue to engage with ECC on this matter.~~The Applicant will update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular | The Outline AMS-WSI is currently not agreed, ~~further comments will be provided in the Local Impact report (ECC Archaeology).~~<br>This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** which is scheduled for submission at Deadline 5 | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | monthly meetings with the Local Planning Authorities and Historic England and will consider any detailed comments provided in Local Impact Reports. | | |
| 3.7.26 | Programme for completion of archaeological fieldwork | A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.<br>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.<br>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required. | The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required. | Agreed |
| 3.6.27 | Supplementary Environmental Information | NG sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued in June 2025.<br>Given the comments provided it is understood that ECC are in agreement with the part of the note that sets out the approach to | ECC is in agreement with this matter. | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | supplementary information that will be provided for the DCO examination. | | |

## 3.8 Hydrology, Land Drainage and Flood Risk

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.8.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 9.2 of **6.12 Environmental Statement Chapter 12 ~~(~~- Hydrology~~,~~ Land Drainage and Flood Risk~~) of the ES~~ [APP-221]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br>**~~Updated position (February 2026):~~**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including storage calculations) ~~will be shared with ECC and~~was submitted to the examination in the form of ~~a~~**8.2 Drainage Strategy** ~~report. This is also expected to be shared~~**[REP1-072]** at Deadline 1. | On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083).<br>ECC provided the following details in their relevant representations dated 27 November 2025:<br>• For surface runoff disposal during construction and from built areas (offices, storage compounds), this will need to be designed in accordance with 'The Sustainable Drainage Systems Design Guide for Essex 2020' and should capture / control all surface water discharge. Unrestricted runoff from the site into any open water body or sewer is not considered acceptable.<br>~~• The LLFA notes that the allowance for~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | In paragraph 2.3.2 of **7.9 Flood Risk Assessment [APP-331]** the Applicant confirms that, the allowance applied within the surface water drainage designs, is for a 45% uplift in peak rainfall for climate change. This is in line with ECC requirements.<br>~~National Grid~~The Applicant will continue to engage with ECC on this matter. | ~~climate change as proposed in the FRA, is 40% for drainage serving permanent assets. With reference to standard policy and guidance however, the normal expectation for climate change allowances for peak rainfall is 45%. This latter figure should form the basis for assessment in the FRA.~~<br>• ~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ECC provided initial comments on the revised Drainage Strategy **[REP1-072]** at Deadline 3. Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. | |
| **EIA – Approach and Methods** | | | | |
| 3.8.2 | Study area | The study area was agreed through the ~~EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| 3.8.3 | Data sources | Sufficient desktop and survey data has been collected to inform the assessment as presented within **Section 12.4** of **6.12 Environmental Statement Chapter 12 ~~(~~- Hydrology~~,~~ Land Drainage and Flood Risk~~)~~ ~~of the ES~~ [APP-221].**<br>~~**Updated position (February 2026):**~~ | With reference to **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]**, the listed data sources are accepted.<br>~~On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and was submitted to the examination in the form of ~~a~~**8.2 Drainage Strategy** ~~report~~**[REP1-072]**. This ~~is also expected to be shared~~was submitted at Deadline 1.<br><br>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [~~APP-300~~ REP3-025]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.<br><br>~~National Grid~~The Applicant will continue to engage with ECC on this matter. | ~~water management and storage calculations/requirements.~~<br><br>~~This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083)~~<br><br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br><br>~~• The submitted FRA contains no specified discharge limits. Further, there~~With regard to surface water management, it is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. There are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding – ECC advises that reference should be made to the ECC Culvert Policy.<br><br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | not had sight of the documentation referenced in the NGET position. Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5 and ECC welcomes continued engagement on this matter. | |
| 3.8.4 | Assessment methodology | The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** Opinion received from the Planning Inspectorate.<br>National GridThe Applicant shared technical notes for the following:<br>• Works In, Over and Under Watercourses | The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.<br>It was also noted in the Statutory Consultation that ECC does not raise any principal areas of disagreement with National Grid on this topic. | Agreed |
| 3.8.5 | Key parameters and assumptions | Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in **Section 12.4** of **6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221]**. The key parameters and assumptions presented are considered appropriate.<br>**Updated position (February 2026):**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared | On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.<br>ECC welcomes further discussion on these issues.<br>As set out in ECC's LIR **[REP1-161]** where a number of points were made in respect of the submitted FRA **[APP-331],** the LLFA requests further clarity on the location of permanent and temporary construction works especially given the limits of deviation, but all works will require appropriate flood mitigation and surface runoff | Under discussionDiscussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.~~<br>~~With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [APP-300]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.~~<br>~~National Grid will continue to engage with ECC on this matter.~~Please see response to ID3.8.3 above. | management, to ensure any excess runoff from drainage systems does not impact the surrounding area.<br>This detail is still outstanding ~~as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5 and ECC welcomes continued engagement on this | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | matter. | |
| **EIA – Baseline Conditions** | | | | |
| 3.8.6 | Baseline conditions and receptors | The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of **6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221]**. The baseline conditions and receptors presented are considered appropriate.<br>**Updated position (February 2026):**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.<br>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [APP-300]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.<br>National Grid will continue to engage with | On going discussions which have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.<br>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following details in their relevant representations dated 27 November 2025:<br>• The submitted FRA contains no specified discharge limitsIt is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding | Under discussionDiscussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~ECC on this matter.~~Please see response to ID3.8.3 above. | ~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5 and ECC welcomes continued engagement on this matter. | |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.8.7 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of **6.12 Environmental Statement Chapter 12 ~~(~~- Hydrology~~,~~ Land Drainage and Flood Risk~~)~~ ~~of the ES~~ [APP-221]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>**~~Updated position (February 2026):~~**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) ~~will be shared with ECC and~~was submitted to the examination in the form of ~~a~~**8.2 Drainage Strategy** ~~report. This is expected to be shared~~**[REP1-072]** at Deadline 1.<br>With regard to the culvert at the proposed | ECC acknowledges that many of its initial issues have been resolved. However, further clarity is required on the surface water runoff from construction sites, haul roads and operational assets and the SuDs techniques proposed to mitigate runoff..<br>~~On going discussions which have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.~~<br>~~This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083). ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• The submitted FRA contains no specified discharge limits~~It is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [~~APP-300~~ REP3-025]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.<br>~~National Grid~~The Applicant will continue to engage with ECC on this matter. | context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5 and ECC welcomes continued engagement on this matter. | |
| 3.8.8 | Standard mitigation | Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of **6.12 Environmental Statement Chapter 12 ~~(~~- Hydrology~~,~~ Land Drainage and Flood Risk~~)~~ ~~of the ES~~ [APP-221]** and set out in the **Outline ~~CoCP [APP-300~~Code of Construction Practice [ REP3-025]**. The standard mitigation is considered appropriate | ~~On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the~~ECC acknowledges that many of its initial issues have been resolved. Clarification about proposals for surface water management and storage calculations/requirements, is required. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | and adequate, in terms of its nature and scale, to address potential effects.<br>**~~Updated position (February 2026):~~**<br>~~National Grid~~The Applicant provided a response to this matter at Deadline 1 ~~through the relevant representations process (document reference 8.4.1)~~in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** | ~~The detail for the construction phase is acceptable – ECC Relevant Representation dated 27 November 2025 (RR-1083)~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5 and ECC welcomes continued engagement on this matter. | |
| 3.8.9 | Additional mitigation | The consideration of additional mitigation measures are presented in Section 12.6 of **6.12 Environmental Statement Chapter 12 (~~-~~ Hydrology~~,~~ Land Drainage and Flood Risk~~) of the ES~~ [APP-221]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects<br>**~~Updated position (February 2026):~~**<br>~~Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and submitted to the examination in the form of a Drainage Strategy report. This is expected to be shared at Deadline 1.~~<br>~~National Grid will continue to engage with ECC on this matter.~~Meeting proposed to further discuss mitigation for surface water | ~~On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.~~<br>ECC acknowledges that many of its initial issues have been resolved. However clarity is ~~Clarity~~ required on whether this point is referring to construction or operation of the scheme as different measures may be required.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. ECC welcomes continued engagement on this matter and will | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | flood risk (linked to comments received on **8.2 Drainage Strategy [REP1-072])**. | review comment on the updated Drainage Strategy | |
| **EIA – Assessment Conclusions** | | | | |
| 3.8.10 | Construction effects | The assessment of effects during construction is presented in **Section 12.7** of **6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221]**. The assessment of effects during construction presented is considered appropriate.<br>**Updated position (February 2026):**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) will be shared with ECC andwas submitted to the examination in the form of a**8.2 Drainage Strategy** report. This is expected to be shared**[REP1-072]** at Deadline 1.<br>National GridThe Applicant will continue to engage with ECC on this matter. | On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding theECC acknowledges that many of its initial issues have been resolved. However, further clarity on the Applicants proposals for surface water management and storage calculations/requirements., is required<br>The detail provided is appears acceptable for construction phase but ECC would refer to commentswould highlight comment raised in its Relevant Representation dated 27 November 2025 (RR-1083). ECC provided the following details in their relevant representations dated 27 November 2025:<br>• that in In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.<br>ECC is unable to respond to NGET's Updated position (February 2026) as the authority has | Under discussionDiscussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | | ~~not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. ECC welcomes continued engagement on this matter and will review its comments with reference to the updated Drainage Strategy | |
| 3.8.11 | Operational (and maintenance) effects | The assessment of effects during operation (and maintenance) is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 (~~-~~ Hydrology~~,~~ Land Drainage and Flood Risk~~)~~ ~~of the ES~~ [APP-221].** The assessment of effects during operation (and maintenance) presented is considered appropriate.<br>**~~Updated position (February 2026):~~**<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) ~~will be shared with ECC and~~was submitted to the examination in the form of ~~a~~**8.2 Drainage Strategy** ~~report. This is expected to be shared~~**[REP1-072]** at Deadline 1.<br>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [~~APP-300~~ REP3-025]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the | ~~On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the~~ECC acknowledges that many of its initial issues have been resolved. However, further clarity on the Applicants proposals for surface water management and storage calculations/requirements is required.<br>~~This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083) ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• The submitted FRA contains no specified discharge limits~~is Although it is acknowledged that the Drainage strategy does provide discharge rates for features, there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.<br>~~National Grid~~The Applicant will continue to engage with ECC on this matter. | area associated with the proposed Tilbury North Substation have not been provided. ~~It is therefore~~While the commitment W08 within **7.2 Outline Code of Construction Practice [APP-300 REP3-025]** is noted, it is impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. ECC welcomes continued engagement on this matter and will review its comments with reference to the updated Drainage Strategy | |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.8.12 | Outline CoCP (including Flood Warning and Evacuation Plan) | The **Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]**includes all relevant construction mitigation measures specified in **6.12 Environmental Statement Chapter 12 (~~-~~ Hydrology~~,~~ Land Drainage and Flood Risk~~) of the ES~~ [APP-221]** and is appropriate for managing construction impacts from the Project.<br>~~A meeting was held in October 2024 to agree on the structure for the **Outline CoCP**~~ | On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements.<br>~~ECC position pending sight of final ES / FRA.~~ The detail provided is acceptable for the construction phase but ECC would refer to comments raised in its Relevant | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~**[APP-300]**~~.<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300]**.~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the meeting and feedback in writing.~~<br>~~**Updated position (February 2026):**~~<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) ~~will be shared with ECC and~~was submitted to the examination in the form of ~~a~~**8.2 Drainage Strategy** ~~report. This is expected to be shared~~**[REP1-072]** at Deadline 1.<br>~~National Grid will continue to engage with ECC on this matter.~~ | Representation dated 27 November 2025 (RR-1083)<br>ECC provided the following details in their relevant representations dated 27 November 2025:<br>• In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.<br>ECC is unable to respond to ~~NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position.~~ NGET on this matter. Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. ECC welcomes continued engagement on this matter and will review comment on the updated Drainage Strategy | |
| **Other matters as required** | | | | |
| 3.8.13 | Flood Risk Assessment (FRA) | The draft FRA was issued to stakeholders in January and March 2025.<br>The scope, methodology, assessment and | ~~On going discussions that~~Discussions have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | conclusions drawn in the FRA are considered appropriate and proportionate.<br>~~**Updated position (February 2026):**~~<br>Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) ~~will be shared with ECC and~~were submitted ~~to the examination in the form of a~~**8.2 Drainage Strategy** ~~report. This is expected to be shared~~**[REP 1-072]** at Deadline 1.<br>The Applicant will engage with the LLFA to discuss and resolve the comments provided on the Applicant's Drainage Strategy **8.2 Drainage Strategy DCO [REP1-072]** with a view to submitting a revision to the document at a future deadline.<br>With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [~~APP-300~~REP3-025]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. | water management and storage calculations/requirements.<br>This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 (RR-1083)<br>ECC provided the following details in their relevant representations dated 27 November 2025:<br>• The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding.<br>• In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~National Grid will continue to engage with ECC on this matter.~~ | Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.<br>ECC is unable to ~~respond to NGET's Updated position (February 2026) as the authority has not had sight of the documentation referenced in the NGET position~~comment further on this matter. Following a meeting with the Applicant on 27.04.26, it is understood a further iteration of the Drainage Strategy will be submitted at Deadline 4 or 5. ECC welcomes continued engagement on this matter and will review comment on the updated Drainage Strategy. | |

## 3.9 Landscape and Visual

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.9.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Landscape and Visual ~~assessment~~Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~) of the ES~~ [APP-226]**. | ECC agree with the overarching policy documents stated in the PEIR but would wish to also see reference and further action in relation to NPS EN-1. Section 4 Assessment, Para 4.1.5 Weighing Impacts and Benefits:<br>*'In considering any proposed development … the Secretary of State should take into account…* | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | All relevant legislation, policy and guidance ~~has~~have been identified and appropriately considered to inform the assessment.<br>~~**Update position (February 2026):**~~<br>~~National Grid note that following a meeting to discuss the Statement of Common Ground in January 2026 specific elements to discuss include National Landscapes and furthering the purpose and landscape mitigation/compensation.~~ The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. | • *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'<br>In ECC's Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues they flagged that a Valued Landscape Assessment should form part of the Landscape and Visual Impact Assessment carried out e.g. through the final EIA. Local landscape designation no longer forms part of promoted government policy and therefore local value generally needs to be assessed in line with<br>'TGN 02-21: Assessing landscape value outside national designations'<br>Valued landscape criteria have now been included in the landscape assessment; however, ECC is concerned that some of the evaluation is flawed. In addition, as the baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly affected, particularly river valleys ECC also had concerns regarding whether a preliminary judgement on significance had been determined without going through the stage of identifying susceptibility and magnitude of effects. ECC are substantially | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | | satisfied that all stages of the LVIA process have been executed although not necessarily with all aspects of the approach.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| **EIA – Approach and Methods** | | | | |
| 3.9.2 | Study area | The ~~study area for assessing~~ Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The study area was agreed through the ~~EIA~~**6.19 Scoping Report** ~~and the~~**[APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic workshops. | Generally ECC do not have issues with the study area, however, in relation to the visual assessment ECC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under ~~discussion~~Discussion |
| 3.9.3 | Data sources | Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~)~~ ~~of the ES~~ [APP-226]**.<br>The request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]** was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure. Each LVIA visualisation in **7.12 Visualisations [APP-343 to APP-351]** is accompanied by a location | ECC Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified that the limited number of viewpoints and visualisations that are proposed over the length of the Project needed to be reviewed. Generally, ECC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, ECC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance. ECC also remarked that the preliminary LVIA did not appear to include details of the agreed criteria on which the assessment judgements are | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | map on 1:25,000 OS mapping with the field of view also indicated on the figure. The viewpoint assessment in Annex A of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]** is accompanied by 1:25,000 OS mapping and aerial imagery. | based Whilst all criteria have now been identified and presented in the ES, ECC retain issue with the approach to landscape value and value of the view.<br>ECC identified a number of additional areas where they believe data quality and presentation could be improved in order to aid access and interpretation. The following remain of concern<br>• Increase scale of visual receptor maps e.g., a 1:10,000 baseline as used for the Proposed Project Design Maps<br>• Wireline visualisations e.g., *Volume II: Figures Part 18 of 27: Figures 13.9.51 - 13.9.56 - Wireline Visualisations*. Label by route section and/or district rather than figure number alone.<br>ECC welcome the changes made on the other issues.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| 3.9.4 | Assessment methodology (including LVIA methodology ~~and viewpoints~~) | The ~~outline~~assessment methodology ~~for assessing~~is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual** ~~was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate~~**Methodology [APP-227]**.<br>~~Meetings were held on the 25 September 2024 to seek to agree the detailed methodology as well as the number and~~ | In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, ECC retain concerns in a select individual areas where there remain gaps in the coverage. Still ~~under discussion~~Under Discussion. In relation to valued landscapes see comments from statutory consultation and response at 3.8.3 above.<br>ECC retain concerns that without a separate valued landscape assessment the project | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~location of viewpoints. ECC requested the inclusion of a Valued Landscape Assessment.~~<br>~~An appraisal of landscape value was undertaken and is provided in **Annex A** of **Appendix 13.2: Landscape Baseline and Assessment [APP-228]**. This is not a full Valued Landscape Assessment but adopts the criteria within Landscape Institute guidance, 2021, which National Grid consider to be appropriate for the Project.~~<br>~~March 2025, National Grid issued an update on the Landscape and Visual Impact Assessment (LVIA) Viewpoints and Methodology.~~Paragraph 13.4.9 and Table A13.1.4 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** set out the approach to consideration of landscape value. The Applicant's position regarding the approach to landscape value is set out in response ID 7.5.1 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A) [REP2-030]**. | cannot be judged fairly against policy in (EN-1) 5.10.12 '*Outside nationally designated areas, there are local landscapes that may be highly valued locally'* nor how the following in the current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: '*Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.'* This issue relates particularly in several river valleys along the route.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| 3.9.4a | Viewpoints | The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]**. Visualisations are provided in **7.12 Visualisations [APP-343 to APP-351]**.<br>The approach to selecting viewpoints is set | | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].** The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the **Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]).** The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066].** This includes viewpoints beyond 1.5 km within Chelmsford district. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in **7.12 Visualisations [APP-343 - APP 349]**. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the **7.12 Visualisations [APP-350 - APP-351]**. It is important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone. | | |
| 3.9.5 | Key parameters and assumptions | Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of **6.13** | Latest version of ES required – ECC position to be confirmed. ECC are not sure what is meant by the terms key parameters and assumptions. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | **Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226]**. The key parameters and assumptions presented are considered appropriate. | Section 13.4 is headed 'Project Engagement and Consultation'. To be reviewed.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| **EIA – Baseline Conditions** | | | | |
| 3.9.6 | Baseline conditions and receptors | The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226]**. The baseline conditions and receptors presented are considered appropriate.<br>The Applicant's position regarding the approach to visual receptors and groupings is set out in response ID 7.8.2 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A) [REP2-030]**. | Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified concerns with the Visual Receptors and Groupings have been identified based only partially on shared landscape characteristics and a similarity in the nature of views. ECC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. ECC retain these concerns.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under discussionDiscussion |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.9.7 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set outmeasures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and also paragraphs 13.6.2 to 13.6.4 in **Section 13.6** of **6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226]**. Embedded | E-mail 5th5 Nov 2024 – Landscape – adequacy of undergrounding, mitigation and lack of compensation are all still under discussionUnder Discussion. ECC retain these concerns.<br>ECC acknowledges the embedded and standard mitigation measures proposed. However, significant residual impacts remain, particularly in sensitive landscape areas.<br>Following a meeting held in January 2026, ECC | Under discussionDiscussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | note their position on this matter is unchanged. | |
| 3.9.8 | Standard mitigation | Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.<br>Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~) of the ES~~ [APP-226]** and ~~set out in the~~**7.2 Outline ~~CoCP [APP-300].~~Code of Construction [REP3-025]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | Standard mitigation does not address residual significant landscape and visual impacts.<br>Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under ~~discussion~~Discussion |
| 3.9.9 | Additional mitigation | Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures are presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~) of the ES~~ [APP-226]**. ~~Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~<br>The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of **8.8.2** | Additional mitigation does not address residual significant landscape and visual impacts.<br>Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | **Applicant's Comments on Local Impact Reports [REP2-030]** and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10. | | |
| **EIA – Assessment Conclusions** | | | | |
| 3.9.10 | Construction effects | The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~)~~ ~~of the ES~~ [APP-226]**. The assessment of effects during construction presented is considered appropriate.<br>~~**Updated position (February 2026):**~~<br>With regard to vegetation loss, the assessment is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4~~:~~ - Project Description [APP-130]** and presented on ~~the~~**2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [APP-048 ~~to APP-055~~]**. | E-mail ~~4th~~4 Nov 2024 - Landscape – Potential tree and hedgerow loss along the route has not been meaningfully quantified in landscape and visual terms in the assessment.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged.<br>As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination. | Under ~~discussion~~Discussion |
| 3.9.11 | Operational (and maintenance) effects | The ~~assessment of effects during operation (and maintenance) is presented in **Section 13.7 of Chapter 13 (**~~approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual~~) of the ES [APP-226]. The assessment of effects during operation (and maintenance) presented is considered appropriate~~ **Methodology [APP-227]** and was shared and discussed | **Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues –** ECC identified that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing is required, particularly in river valleys, to protect valued local landscapes, long-distant rights of way and rural amenity sites.<br>ECC also flagged up that the PEIR | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | with stakeholders. The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** and also **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and assessment [APP-229 to APP-232]** and illustrative materials on **Figures 13.1 to 13.19 of the ES (6.13.F1 to 6.13.F19 [APP-237 to APP-255]).** The assessment team, which includes highly experienced Chartered Members of the Landscape Institute, has thoroughly explored potential effects on landscape out to 3 km from the Project, and their findings and judgements are set out in an objective and consistent manner. It is considered that the judgements made remain fair and reasonable and that no changes need to be made. | acknowledges there will be a significant negative landscape and visual impact at both construction and operational stages over the length of the Project.<br>And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this.<br>The issues above remain substantially unaddressed.<br>Criteria for e.g. the sensitivity (susceptibility and value) and magnitude of effects, are now presented in the ES although ECC retain concerns with how some of these are defined and evaluated.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.9.12 | Outline CoCP | ~~The~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~) of the ES~~ [APP~~- 226~~-226]** and is appropriate for managing construction impacts from the Project.<br>~~Meeting held in October 2024 to agree on the~~ | Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under ~~discussion~~Discussion |

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| | | ~~structure for the **Outline CoCP [APP-300]**.~~<br>~~Meeting held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300]**.~~<br>~~A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.~~ | | |
| 3.9.13 | Outline LEMP | ~~The~~**7.4 Outline ~~LEMP~~Landscape and Ecology Management Plan [REP3-030]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 ~~(~~- Landscape and Visual~~) of the ES~~ [APP-226]** and is appropriate.<br>~~Meeting held in October 2024 to agree on the structure for the **Outline LEMP [AS-046]**.~~<br>~~Meeting held in March 2025 to discuss the second iteration of **the Outline LEMP [AS-046]**.~~<br>~~A further iteration of **the Outline LEMP [AS-046]** was issued in May 2025 following the meeting and feedback in writing.~~ | Retain major issues particularly in relation to definition, scope and scale of term 'compensation'.<br>In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from "enhanced mitigation" to "landscape compensation" require clarification to ensure these are not repurposed mitigation measures, risking double-counting.<br>ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence.<br>ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| 3.9.14 | Cumulative Effects | The cumulative effects of the Project have been assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** This includes an assessment of cumulative effects on landscape and visual receptors.<br>~~National Grid notes the comments and will continue to engage with ECC on this matter.~~The cumulative assessment will be updated and published at Deadline 4 to include Five Estuaries, North Falls, the Tarchon Interconnector Project and any other newly identified schemes in the area around Ardleigh and along the rest of the Project. | Concern regarding potential cumulative adverse landscape and visual effects, both at construction and long-term operational, particularly in relation to other NSIP projects such as Bramford to Twinstead, North Falls and Five Estuaries substations.<br>In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages.<br>The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact across the entire county, especially in the vicinity of Ardleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states: "Whilst the applicant may not have any or very limited choice in the physical | Under ~~discussion~~Discussion |

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| | | | appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."<br>Following a meeting held in January 2026, ECC note their position on this matter is unchanged. | |
| **Other matters as required** | | | | |

## 3.10 Socio-economics, Recreation and Tourism

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.10.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 ~~(~~- Socio-economics~~,~~ Recreation and | ~~Latest iteration of Technical Note to be reviewed.~~<br>~~It is also requested that skills should be considered separately from community benefits.~~<br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>ECC has produced a 'Skills and Employment | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Tourism~~) of the ES~~ [APP-265].<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~<br>~~**Updated position (February 2026):**~~<br>Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. ~~Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project.~~<br>The Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.<br>However, the Applicant will work with local | Principles for Major Project and Developments' document, which outlines ECC's expectations of what a Local Employment and Skills Plan should cover. The requirement for the skills and employment plan/strategy is justified in the Essex Developers' Guide to Planning<br>Contributions document which details the scope and range of contributions towards infrastructure which ECC may seek from developers in order to mitigate the impact in a consistent and transparent manner where developers and local residents can understand how development is making a positive contribution to local communities.<br>ECC welcomes the Applicant's recognition of the importance that host communities and authorities place on the delivery of social value, including employment opportunities, skills development and local supply chain participation.<br>ECC considers that 480 jobs is significant whatever the size of the project and that both in the short term and long term, opportunities for local employment and training as well as opportunities for local business to access the supply chain should be captured through the project especially as it remains ECC's opinion that the Project will have an impact during the construction phase on local business due to impact on key routes and junctions **[ECC LIR REP1-161].** It is therefore requested that skills should be considered separately from | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material 1 in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance~~OBJ~~. | community benefits.<br>ECC welcomes the Applicant's commitment to engage with the Council on an Employment, Skills and Supply Chain Plan which responds to concerns raised **[ECC LIR REP1-161]** regarding the absence of a consolidated document at application stage and provides greater transparency on the approach to these matters. ECC believes however that this should a document which is subject to the approval of the Council through the DCO.<br>• ECC ~~also~~ considers that ~~the Applicant~~any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes:<br>• ~~—~~Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes<br>• ~~—~~Commitments to local job creation and use of local contractors where feasible<br>• ~~—~~Evidence-based interventions informed by community engagement and local labour market data<br>• ~~—~~A sustainability and legacy framework to ensure initiatives continue from | |

[1] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*.

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | construction through to operation<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~In addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery. | |
| **EIA – Approach and Methods** | | | | |
| 3.10.2 | Study area | The **6.20 Scoping Opinion [APP-297]** stated, "The Applicant should seek to agree the study area with the relevant local authorities". A meeting was held on 12 September 2024 to seek to agree this point in the **6.20 Scoping Opinion [APP-297]**.<br>Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity. | Email dated ~~3rd~~3 October 2024 confirmed that ECC were in agreement on the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note, in relation to employment and skills.<br>Email dated 10 April 2025 noted:<br>In principle ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, would propose that where it is identified that | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.<br>~~As ECC only had sight of updated position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | |
| 3.10.3 | Data sources | Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 ~~(~~-Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265]**.<br>The Applicant confirms that the Employment and Skills Plan will address matters raised across the Local Impact Reports, including:<br>• The approach to construction employment and workforce composition<br>• Opportunities for skills development, apprenticeships and training aligned with industry standards<br>• Engagement with education providers and skills bodies where appropriate<br>• Principles for local and regional supply chain engagement<br>• Coordination with The Great Grid Partnership's established delivery processes.<br>~~Due to the characteristics of the works, the~~ | ~~Clarification requested on what is being done for training and skills.~~ There is a lack of reference to data on employment and skills and it is suggested a regional skills analysis is undertaken.<br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• To~~ECC highlighted in its relevant representation **[RR-1083]** and its LIR (REP1-161] that :to enable effective planning and ensure Essex residents are equipped to take advantage of employment opportunities arising from this project, ECC strongly urges the Applicant to provide detailed labour market demand data as early as possible. This will allow for timely coordination with local education and training providers, enabling the development of targeted upskilling programmes and reducing the risk of workforce shortages that could delay project delivery.<br>~~• As ECC only had sight of NGET's updated~~ | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. The Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.~~The Applicant will engage with ECC on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record. | ~~position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ECC is pleased to see the Applicants commitment to the preparation of an employment, skills and supply chain strategy and that it will be engaging with ECC on the scope and content of this document. ECC remains of the opinion that the Applicant should provide detailed labour / workforce data as set out in ECC's Relevant Representation **[RR-1083]** and **Local Impact Report [REP1-161]** as part of this process to enable the development of targeted upskilling programmes. | |
| 3.10.4 | Assessment methodology | ~~The~~**6.20 Scoping Opinion [APP-297]** stated, *"The Applicant should seek to agree the study area with the relevant local authorities"* and *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".* A meeting was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion.<br>The 3rd Technical Note was issued in March 2025 to seek agreement on the study area | Email dated 10th April 2025 noted:<br>In principle ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, ECC would propose that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.<br>During their review of the Statement of | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | and methodology.<br>~~Further discussions will take place following National Grid's review of ECC's Local Impact Report (LIR).~~ The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports (AENC-NG-CNS-REP-0291).** | Common Ground on 16 December ~~2026~~2025, ECC request further discussion on status of this position~~.~~ and to date, this remains an outstanding issue for discussion | |
| 3.10.5 | Key parameters and assumptions | Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES [APP-265]**. The key parameters and assumptions presented are considered appropriate.<br>Regional employment and skills analysis are set out in the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, Paragraph 15.5.8 to 15.5.15.<br>~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~<br>~~The scale of construction employment arising from the Project is modest, as set out in ID 3.9.3. Regional employment and skills analysis are set out in the **ES, Chapter 15: Socio-economics, Recreation and Tourism, Paragraph 15.5.8 to 15.5.15 [APP-265]**. Notwithstanding this, the~~ | ~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>~~However,~~ ECC would like to make a general comment requesting clarification on what NG are doing for training and skills. There is a lack of reference to data on employment and skills, and it is suggested that a regional skills analysis is undertaken. ECC would also like to take the opportunity again to suggest that skills should be considered separately from community benefits.<br>~~. It is expected that further detail will be provided in the Llocal limpact Rreport.~~<br>~~As ECC only had sight of NGET's updated position on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ECC is pleased to see the Applicants commitment to the preparation of an employment, skills and supply chain strategy and welcomes the opportunity to discuss its scope and content but remains of the opinion that the Applicant should provide detailed labour / workforce data as set out in | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~As stated above, the Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5. The Applicant will engage with ECC on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record. | **ECC's Relevant Representation [RR-1083]** and **Local Impact Report [REP1-161]** thereby enabling the development of targeted upskilling programmes | |
| **EIA – Baseline Conditions** | | | | |
| 3.10.6 | Baseline conditions and receptors | ~~The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in **Section 15.5** of **Chapter 15** (**Socio-economics, Recreation and Tourism**) of the **ES [APP-265]**. The baseline conditions and receptors presented are considered appropriate.~~<br>~~**Updated position (February 2026):**~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National~~ | As concluded in the ES (APP-265) at 15.5.22, "Although there is a readily available labour force, there is also potential skills gap in the area'"<br>~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>~~It is expected that further detail will be provided in the Local Impact Report.~~ECC therefore remains of the opinion that the Applicant should provide detailed labour / | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~Grid will continue to engage with ECC on this matter.~~The demographic, environmental and socio-economic characteristics of Essex have been described in Section 10.5 'Baseline Conditions' in 6**.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** and in **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [APP-193]**. How vulnerable populations would be differentially affected has been summarised in Table 10.5 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP 192]** and in the overview of impact pathways described for each health determinant. | workforce data as set out in Paragraphs 4.8.12 – 4.8.14 of **ECC's Local Impact Report [REP1-161]** to enable effective planning, coordination with local education and training providers and the development of targeted upskilling programmes. | |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.10.7 | Embedded mitigation | Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 ~~(~~- Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>The Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing | ~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>~~It is requested that skills should be considered separately from community benefits.~~<br>~~.~~It is expected that further detail will be provided in the Local Impact Report.<br>ECC recognise that the potential effects on community facilities, businesses, tourism, and recreational assets, have been considered as part of the project design. Notwithstanding, ECC believe there is potential for significant (although) short term impact to businesses along the planned route, including in particular wedding venues, education facilities and equestrian centres. Which is not accepted by | Under ~~discussion~~ Discussion |

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| | | electricity network. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used.<br>~~**Updated position (February 2026):**~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR.~~<br>~~National Grid will continue to engage with ECC on this matter.~~This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. | the Applicant. Although the disruption will be short term, it has the potential to have a significant financial impact if not all parts of the site are usable, or accessibility is impacted. This needs careful management and consideration to ensure appropriate mitigation and compensation for these businesses.<br>ECC is of the opinion that skills and employment should be considered separately from community benefits and secured through the DCO.<br>ECC is therefore pleased to see the Applicants commitment to the preparation of an employment, skills and supply chain strategy and welcomes the opportunity to discuss its scope and content further . | |
| 3.10.8 | Standard mitigation | Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15** ~~(~~**-Socio-economics~~,~~ Recreation and Tourism**)** ~~of the **ES**~~ **[APP-265]** and set out in ~~the~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]** . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~**Updated position (February 2026):**~~<br>As stated above, the Applicant is producing | ECC acknowledges the measures proposed in GG10 and SO3 of the Environmental Statement Chapter 15 - **Socio-economics Recreation and Tourism [APP-265]** (Chapter 15) with regards to the effects on community facilities, businesses, tourism, and recreational assets<br>~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>~~It is requested that skills should be considered separately from community benefits.~~<br>~~ECC provided the following details in their relevant representation dated 27 November 2025:~~ | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | an Employment and Skills Plan which will be submitted at Deadline 5. The Applicant will engage with ECC on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record.<br>Separate to skills, the Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used.<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~ This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. | • ~~The~~ECC highlighted in its relevant representation **[RR-1083]** and again at Paragraphs 4.8.21 – 4.8.31 of ECC's **Local Impact Report [REP1-161]**, that the Applicant should actively engage with relevant partners to mitigate risks associated with skills shortages and consider opportunities for shared apprenticeships, traineeships, and collaborative training programmes across concurrent projects. A strategic approach ~~29~~ that considers the wider infrastructure pipeline will help maximise social value and ensure long-term benefits for the local workforce.<br>ECC is therefore pleased to see the Applicants commitment to the preparation of an employment, skills and supply chain strategy and welcomes the opportunity to discuss its scope and content further although ECC is of the opinion that this should be secured through the DCO<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ECC is therefore of the opinion that skills and employment should be considered separately from community benefits and secured through the DCO. | |
| 3.10.9 | Additional mitigation | The consideration of additional mitigation measures are presented in Section 15.6 of **6.15 Environmental Statement Chapter 15** | ~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>~~It is requested~~ECC considers that skills should | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~(~~- **Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265]**.** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~**Updated position (February 2026):**~~<br>As stated above, the Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5. The Applicant will engage with ECC on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record.<br>Separate to skills, the Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used.<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for | be considered separately from community benefits.<br>ECC is concerned that the Norwich to Tilbury project could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with appropriate funding through a Section 106 agreement.<br>The proposed development is a major project which could result in increased demand for construction skills and equipment at a time when other major projects may also | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. | commence with similar timeframes and result in shortages<br>ECC welcomes the Applicant's commitment to prepare and submit an Employment and Skills Plan into the Examination, which responds to concerns raised **[ECC LIR REP1-161]** regarding the absence of a consolidated document at application stage and provides greater transparency on the approach to these matters. ECC believes however that this should a document which is subject to the approval of the Council through the DCO.<br>ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes:<br>• Clear delivery plans for pprenticeships, work placements, school engagement, and training programmes<br>• Commitments to local job creation and use of local contractors where feasible<br>• Evidence-based interventions informed by community engagement and local labour market data<br>• A sustainability and legacy framework to ensure initiatives continue from construction through to operation<br>Further advice on the scope and content of | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | any Strategy is provided in Section 4.8 of the Council's **Local Impact Report [REP1-161]**<br>In addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery.<br>~~ECC have not provided further comments following review of the Statement of Common Ground it is expected that further detail will be provided in the Local Impact Report.~~While engagement with Host Planning Authorities on the scope of the Plan is welcomed, this does not in itself provide the necessary assurance that agreed outcomes will be secured over the lifetimeof the Project. ECC therefore considers that local authority approval should remain a requirement, consistent with national policy, to ensure accountability and the delivery of meaningful employment, skills and supply chain benefits for local communities. | |
| **EIA – Assessment Conclusions** | | | | |
| 3.10.10 | Construction effects | The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15** | ~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>There is potential for disruption to access to | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~(~~- **Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265].** The assessment of effects during construction presented is considered appropriate.<br>~~**Updated position (February 2026):**~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~ | workplaces and businesses for local residents during construction. The Applicant should seek to minimise the disruption caused during the construction phase and allow access to be maintained as far as possible to mitigate the impact that the work will inevitably have on local residents and businesses.<br>ECC's position is set out in Section 4.8 of the Council's LIR **[REP1-161]** where it is recognised that the proposed development is also a major project which could result in increased demand for construction skills and equipment at a time when other major projects may also commence with similar timeframes and result in shortages. ECC welcomes the opportunity to work collaboratively with the Applicant through a Skills, Employment and Supply Chain Strategy, to maximise the education, skills and employment benefits of the project and leave a legacy for Essex residents.<br>ECC also recognises the impact of residual effects outlines in Section 15.7 of 6.15 Environmental Statement Chapter 15 - **Socio-economics Recreation and Tourism [APP-265]**. ECC consider it will be necessary for the proposed Skills, Employment and Supply Chain strategy is structured to support effective partnerships and maximise the opportunities the development affords local communities, local workforce and local businesses.<br>~~It is expected that further detail will be~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | ~~provided in the local impact report.~~ECC therefore welcomes the Applicant's commitment to engage with the Council on an Employment and Skills Plan which responds to concerns raised **[ECC LIR REP1-161].** | |
| 3.10.11 | Operational (and maintenance) effects | The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 ~~(~~- Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265].** The assessment of effects during operation (and maintenance) presented is considered appropriate.<br>~~**Updated position (February 2026):**Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~ | ~~ECC position pending sight of ES and any further technical paper on this subject.~~<br>There is potential for disruption to access to workplaces and businesses for local residents during construction. The Applicant should seek to minimise the disruption caused during the construction phase and allow access to be maintained as far as possible to mitigate the impact that the work will inevitably have on local residents and businesses.<br>ECC's position is set out in Section 4.8 of the Council's LIR **[REP1-161]** where it is recognised that the proposed development is also a major project which could result in increased demand for construction skills and equipment at a time when other major projects may also commence with similar timeframes and result in shortages. ECC welcomes the opportunity to work collaboratively with the Applicant through a Skills, Employment and Supply Chain Strategy, to maximise the education, skills and employment benefits of the project and leave a legacy for Essex residents.<br>ECC also recognises the residual effects outlined in Section 15.7 of 6.15 Environmental Statement Chapter 15 - **Socio-economics Recreation and Tourism [APP-265]**. ECC | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | consider it will be necessary for the proposed Skills, Employment and Supply Chain strategy is structured to support effective partnerships and maximise the opportunities the development affords local communities, local workforce and local businesses.<br>~~ECC have not provided further comments following review of the Statement of Common Ground. It is expected that further detail will be provided in the local impact report.~~ECC therefore welcomes the Applicant's commitment to engage with the Council on an Employment and Skills Plan which responds to concerns raised **[ECC LIR REP1-161]** | |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.10.12 | Outline CoCP | ~~The~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [ REP3-025]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 ~~(~~- Socio-economics~~,~~ Recreation and Tourism~~) of the ES~~ [APP-265]~~.~~ and is appropriate for managing construction impacts from the Project.<br>Meeting held in October 2024 to agree on the structure for the **7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025].**<br>Meeting held in March 2025 to discuss the second iteration of ~~the~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [REP3-025]** .<br>A further iteration of ~~the~~**7.2 Outline ~~CoCP~~** | ECC position pending sight of ES and any further technical paper on this subject.<br>It is expected that further detail will be provided in the Local Impact Report.<br>ECC is currently reviewing the outline CoCP **[REP3-025]** and will provide an update at Deadline 5 in light of discussions with the Applicant on the proposed Skills, Employment and Supply Chain Strategy. | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~[APP-300~~Code of Construction Practice [REP3-025]] was issued in May 2025 following the meeting and feedback in writing.<br>~~**Updated position (February 2026):**~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~ | | |
| **Other matters as required** | | | | |
| 3.10.13 | Skills and Training | Regional employment and skills analysis are set out in ~~the ES,~~**6.15 Environmental Statement Chapter 15~~:~~ - Socio-economics~~,~~ Recreation and Tourism~~,~~ [APP-265]** Paragraph 15.5.8 to 15.5.15~~ [APP-265]~~.<br>~~**Updated position (February 2026):**~~<br>The Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary, or proportionate in the context of this Project.<br>~~As set out above in ref 3.9.3, the construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. As such, there is no planning harm that would justify the imposition of a financial contribution or fund as mitigation through the Development Consent Order.~~<br>~~It is also important to note that the creation of an Employment and Skills Fund would~~ | ~~ECC would like to make a general comment requesting clarification on what National Grid are~~As submitted, the application contains no reference to an employment and skills plan or strategy. As a result, there is no clarity on what the Applicant is doing for training and skills. ~~There~~In addition, there is a lack of reference to data on employment and skills, and it is suggested that a regional skills analysis is undertaken.<br>ECC would also ~~like to~~ take the opportunity to suggest that skills should be considered separately from community benefits.<br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~• Securing employment and skills benefits must be a central focus of this development and appropriate consideration should be given to this matter within the Examination. There is a real opportunity not only to mitigate potential negative impacts but to leave a~~ | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~constitute a community benefit measure, rather than mitigation for a specific environmental impact. In accordance with established principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through statutory planning requirements. This position is reinforced by the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025), which makes clear that contributions of this nature should be progressed outside the development consent process.~~In response, and to elaborate on what the Applicant said in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will engage with host authorities to inform the content of the Employment and Skills Plan in advance of its submission into the examination. | ~~lasting legacy by upskilling Essex residents and addressing existing sectoral skills gaps. ECC expects the Applicant to work with local partners to ensure that jobs created by the project are accessible to local people and that appropriate training pathways are in place.~~<br>ECC therefore now welcomes the Applicant's commitment to engage with the Council on a Skills, Employment and Supply Chain Strategy which responds to concerns raised **[ECC LIR REP1-161]** regarding the absence of a consolidated document at application stage and provides greater transparency on the approach to these matters. ECC believes however that this should a document which is subject to the approval of the Council through the DCO.<br>ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes:<br>• Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes<br>• Commitments to local job creation and use of local contractors where feasible<br>• Evidence-based interventions informed by community engagement and local labour | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | market data<br>• A sustainability and legacy framework to ensure initiatives continue from construction through to operation<br>• To support this, ECC strongly recommends the establishment of a dedicated Employment and Skills Fund. This fund should be proportionate to the scale and impact of the development and used to<br>• Invest in local further education facilities and provision<br>• Support employment and skills programmes<br>• Enhance careers education and school engagement<br>• Fund ECC officer resource for consultation and monitoring of the employment and skills strategy.<br>• As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the ExaminationIn addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery. | |
| 3.10.14 | Cumulative Effects | Inter-project cumulative effects are set out in **6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES [APP-281]**.<br>**Updated position (February 2026):** The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors.<br>The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes:<br>• Working with local suppliers and supporting forums, such as Chambers of Commerce<br>• Contributing to a coordinated regional approach to electricity industry jobs and | ECC provided the following details in their relevant representations dated 27 November 2025:<br>• ECC is concerned that the Norwich to Tilbury project could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with | Under discussion Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | skills planning<br>• Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.<br>These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement.<br>In this regard, it is noted that community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through the DCO, consistent with the principles set out in the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025). ~~National Grid~~The Applicant will continue to engage with ECC on this matter. | appropriate funding through a Section 106 agreement.<br>ECC considers that 480 jobs is significant whatever the size of the project and that both in the short term and long term, opportunities for local employment and training as well as opportunities for local business to access the supply chain should be captured through the project especially as it remains ECC's opinion that the Project will have an impact during the construction phase on local business due to impact on key routes and junctions **[ECC LIR REP1-161]**. It is therefore requested that skills should be considered separately from community benefits.<br>~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ECC welcomes the Applicant's commitment to engage with the Council on a Employment, Skills and Supply Chain Plan which responds to concerns raised **[ECC LIR REP1-161]** regarding the absence of a consolidated ECC believes however that this should a document which is subject to the approval of the Council through the DCO. | |

## 3.11 Traffic and Transport

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.11.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in **Chapter 2** (**Key Legislation and Planning Policy Context**) **[APP-126]** and **Section 16.2** of **Chapter 16** (**Traffic and Transport**) of the **ES [APP-271]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. | Agreed | Agreed |
| **EIA – Approach and Methods** | | | | |
| 3.11.2 | Study Area | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed | Agreed |
| 3.11.3 | Data sources | Traffic data and modelling files have been provided to ECC for review.<br>Updated modelling has been undertaken at junctions where ECC raised concerns that baseline scenario models presented in **7.11 Transport Assessment [APP-333]** did not appear to accurately reflect baseline operation as expected, or where future baseline highway layouts are going to be changed as a result of improvements provided by other | ~~Waiting for information on latest traffic data comparison with model survey data + queue data for validating model.~~<br>~~Received verbal confirmation that existing survey data used in the modelling was based on worst case hour for each junction.~~A Technical Note was received on 23rd April 2026 relating to traffic modelling. ECC to review and respond to Applicant | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | developments.<br>~~Sufficient desktop and survey data has been collected to inform the assessment as presented within **Section 16.4** of **Chapter 16 (Traffic and Transport)** of the **ES [APP-271].**~~The modelling and traffic flows for these will be provided to ECC for review and a meeting is to be arranged to discuss all findings. | | |
| 3.11.4 | Assessment methodology | The methodology for assessing Traffic and Transport was outlined through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Previous concerns around using 2019 DfT data rather than more recent data have been dealt where 2023 DfT data is presented. | Agreed |
| 3.11.5 | Key parameters and assumptions | The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management Plan [REP3-028]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is | A Technical Note was received on 23rd April 2026 relating to traffic modelling which we understand includes a review of committed development at relevant junctions. ECC to review and provide comment to Applicant<br>Not all traffic assumptions have been accepted as they relate to agreement on monitoring, management and mitigation to ensure the assumptions are retained – in particular:<br>• Workers arrive/depart outside of the local highway peak hours including during the autumn/winter months when there is potential for reducing working days due to weather and lighting conditions<br>• Car occupancy rates of the workforce and mode share<br>In ECC's response to ExQ1 (REP3-078) the following wording was provided to deal with the | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | detailed in the **7.3 Outline Construction Traffic Management Plan [REP3-028].**<br>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 **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, 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. | above assumptions on workers arrival/departure times:<br>• To update paragraph 5.4.17 of the CTMP with: "The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed."<br>• To update Section 2.3 Working Hours to include the following:<br>– Staff working hours will be <INSERT><br>– Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs<br>• Table 6.1 at "Monitoring of vehicles and road network" to include:<br>– Monitoring vehicle movements of HGVs and construction workers.<br>• ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and / or community members. We provided some suggestions as follows:<br>– extending the programme of works to reduce the impact of traffic; | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | – ~~• Identity of sensitive receptors~~warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the ~~PARs relating to school activity~~site; and further disciplinary actions as necessary for repeated incidents<br>– ~~• Table 16.5 sets out assessment criteria based~~ closure of compounds/on ~~thresholds that are defined in the IEMA Guidelines. However, the guidance is clear that these should be viewed as a starting point and used cautiously in any assessment, and that full regard should be given to specific local conditions with a level of judgement required to determine effects.~~<br>site parking to prevent staff arriving/departing during peak hours on the local highway network; or<br>– implementing additional shuttle buses to reduce worker traffic.<br>• Update to the list of non-compliance at Section 6.4.1 as follows:<br>– Construction traffic (including workers) operating outside the agreed hours<br>• The list of non-compliance at Section 6.4.1 to include:<br>– Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | Assessment and ES<br>In the response to the applicant's comments to ECC's LIR we included the following points relevant to the CTWP on car occupancy rates and mode share:<br>• ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2).<br>• ECC does not see why the baseline and future targets could not be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP.<br>• ECC requested that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network.<br>• ECC require the CTWP (APP-311) to | |

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| | | | include a commitment to the use of a crew vehicle for the overhead line workers travelling from compound to sites.<br>• ~~The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet~~The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site. | |
| 3.11.6 | Key parameters and assumptions~~ associated with the~~ | Within **6.16 Environmental Statement Chapter 16 Traffic and Transport** ~~assessment are summarised in **Section 16.4** of **Chapter 16 (Traffic and Transport)** of the **ES** [APP-271]. The key parameters and assumptions presented are considered appropriate.~~ the assessment looked at the increase to future baseline traffic as a result of the Project in combination with committed developments along the PARs. At crossover points, construction traffic will 'give way' to the public highway traffic. At locations where temporary traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway. Further details can be found within the **7.3 Outline Construction Traffic Management Plan [APP-309 Revision B]**. | • Road crossings have not been assessed in the ES on the basis that there is no increase in baseline traffic along the local road. However, there will be impacts as a result of an increase in baseline traffic crossing the local road in terms of safety. ECC would expect this to be managed/agreed through the design process of the crossover and a commitment included in the CTMP – for example our request to include throttling of vehicle movements.<br>The Applicant has not addressed the above point to date. ECC inadvertently neglected to include wording for the above in ECC's response to ExQ1 (REP3-078) on the CTMP. ECC would request the following is considered by the Applicant and included in the CTMP. Suggested wording in italics as follows: | Under Discussion |

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| | | Preliminary designs of the haul road crossover points have been designed in accordance with relevant highways standards~~Comments on committed development provided by ECC on 27 August 2025 need to be taken into account.~~<br>~~Not all traffic assumptions have been accepted as they relate to agreement on monitoring, management and mitigation to ensure the assumptions are retained – in particular:~~<br>• ~~Workers arrive/depart outside of the local highway peak hours including during the autumn/winter months when there is potential for reducing working days due to weather~~ and ~~lighting conditions~~<br>• ~~a~~ a Stage 1 Road Safety Audit undertaken to assess road safety ~~Car occupancy rates~~ of ~~the workforce and mode share~~<br>all road users at these locations. | Update to Paragraph 5.5.10:<br>• At crossover points, construction traffic will 'give way' to the public highway traffic. At locations where temporary traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway. *Throttling of vehicle movements over the public highway should be considered as part of the design process to reduce complacency of drivers using the haul road and improve overall road safety.* | |
| 3.11.7 | Key parameters and assumptions | **Highway junctions/links -** The Applicant has and will continue to engage with Essex County Council on the junction modelling and proposed mitigation.<br>**Routes with nearby schools** – schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and Transport [APP-271]**. Where schools are directly located adjacent to a construction route, e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction** | Some parameters have not been accepted as follows:<br>• HGV arrivals/departures during the peak hours on some routes where there is sensitivity (specific highway junctions/links (~~tbc~~to be agreed) and routes with nearby schools (~~tbc~~to be agreed)<br>• ~~Collision clusters have been determined based on a high threshold level – ECC have reviewed collision data along the PARs and wants to discuss further~~<br>• ~~The thresholds for parking impacts are not~~ | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | **Traffic Management Plan [REP3-028]**. This included a review of all proposed schools identified during the review of committed developments. This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. A review of other existing schools where Essex County Council has raised concerns has been carried out. From our review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as detailed below:<br>1. Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic<br>2. Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour | ~~accepted. A case by case basis is considered more reasonable.~~<br>In response to ExQ1 (REP3-078) ECC set out the following wording to be updated in the CTMP which deals with the above:<br>• Paragraph 2.3.5 to be updated and moved to below 2.3.7 (under Heavy Goods Vehicle Timings) – updated wording shown in italics:<br>– The Contractor(s) commits to restricting HGV movements during school drop off/pick up times on PARs where there is school related activity for the following locations:lQuilters Infant & Junior School, Billericay, A129 and A176lBillericay School (secondary), A129 and A176<br>○ Cressing Primary School, B1018, Tye Green<br>○ Maltings Academy (secondary) and Powers Hall Academy (primary), Spinks Lane/Spa Road, Wickham<br>○ Margaretting Church of England Primary School, B1002, Margaretting<br>– A further review will be undertaken and agreed with the LHA prior to construction to consider restrictions on routes where any new schools have been built. | |

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| | | during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic<br>3. Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic<br>4. Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing. | | |
| 3.11.8 | Key parameters and assumptions | Collision clusters have been assessed using the criteria presented within the **6.19 Scoping Report [APP-296]** and presented at Thematic Group and Regional meetings. National Grid would welcome a review of the collision clusters with ECC and will engage further on this matter. | Collision clusters have been determined by ECC and a–r list of road safety schemes included in the LIR have been discussed with the Applicant. ECC to provide more background to the schemes including costs for the Applicant to consider. | Under Discussion |
| 3.11.9 | Key parameters and assumptions | As defined in the **6.19 Scoping Report [APP-296]**, the assessment criteria and magnitude of parking impact is based on the number of spaces lost for any period over four weeks. The assessment in the Environmental Statement indicates that the suspension of parking is expected only during arrival/departure of AIL vehicles and is therefore short-term (significance of effect has been established as not significant). A | ECC have requested parking surveys in relation to the parking suspensions to support the assumptions set out in the ES. This was identified in ECC's Local Impact Report (REP1=161) at paragraph 4.5.104.<br>The impacts set out in Table A16.4.7 (6.16.A4 ES Appendix 16.4 – Traffic and Transport Construction Effects - APP-275).are based on subjective professional judgement. The basis | Under Discussion |

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| | | case-by-case assessment of parking impacts was undertaken and is reported in Table A16.4.7: Significance of Effect Parking and Loading within **6.16.A4 ES Appendix 16.4 – Traffic and Transport Construction Effects (APP-275)**.<br>Given the duration of the impact and the type of parking affected (e.g. informal kerbside parking), parking surveys were not deemed necessary. National Grid considers that parking surveys would not materially affect the assessment findings, and the resulting impact of the parking suspension. | of the level of significance includes a threshold criteria that has not been agreed with ECC. Loss of parking over even short periods of time has the potential to impact on local residents and lead to inappropriate parking practices to the detriment of highway safety. It is noted in the table that the review takes account of local circumstances. However, it is unclear whether the review included observations at specific times of day when on street parking is at its busiest for the mix of uses in that area? – for example during the day where there is a mix of uses (weekday and/or weekends depending on land uses nearby) and overnight for maximum residential demand. We continue to require parking surveys to support the assumptions in the ES. | |
| 3.11.10 | Key parameters and assumptions | Schools in Essex were considered in the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].** Where schools are directly located adjacent to a construction route e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the Outline CTMP **[REP3-028]**. This mitigation was considered appropriate to avoid the risk of direct interaction between construction HGVs and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked or waiting outside the school. | • As discussed in 3.11.7 above, ECC require timing restrictions on HGV routes during school drop off/pick up in the locations identified. The Applicant has included restriction on construction traffic to avoid the pick up and drop off times of the school in Margaretting only.<br>• ECC note the Applicant has provided justification for limiting the restrictions on PARs in their document 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 (p54) (REP3-070). This is based on a review of infrastructure. However, ECC have stated that observations to understand patterns of | Under Discussion |

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| | | | movement and behaviour should be undertaken to fully understand the risks as set out in ECC's Response in document REP3-077.<br>• The following additional points are noted by ECC:<br>– It can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to the school drop off/pick up times.<br>– Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR) | |
| 3.11.11 | Key parameters and assumptions | The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the | Table 16.5 sets out assessment criteria based on thresholds that are defined in the IEMA Guidelines. However, the guidance is clear that these should be viewed as a starting point and used cautiously in any assessment, and that full regard should be given to specific local conditions with a level of judgement required to determine effects. | Under Discussion |

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| | | IEMA Guidelines Environmental Assessment of Traffic and Movement (2023). This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. | In response to the Applicants comments on ECC's LIR submitted at Deadline 3 (p21 relating to reference 4.5.85) (REP3-077) , ECC set out how there are sections of the PARs that have narrow existing effective footway widths due to dirt/debris overspill that have not been referenced in Tables A16.4.5 and A16.4.6. ECC suggested that the specific PARs that require mitigation in the form of "siding out" to removed the debris/dirt/mud overspill are agreed and for this to be included in the CTMP as an update. However, ECC have also discussed whether the extent of works could be agreed through the Road Safety Review mechanism whereby the PARs are driven to pick up any issues to be rectified prior to works commencing. | |
| 3.11.12 | Key parameters and assumptions | The Applicant has developed the **7.3 Outline Construction Traffic Management Plan [REP3-028]** to monitor, mitigate and manage the impacts around construction traffic. National Grid is committed to monitoring and managing the Project's impact on the road network; Section 6 of the Outline CTMP sets out the robust procedures that are anticipated to be undertaken to monitor and manage compliance with the Outline CTMP during construction. This includes detail of the Non-Compliance Procedure in Section 6.3. Instances of non-compliance will be investigated to identify corrective actions where necessary. Section 6 also sets out that the Main Works Contractor(s) will be expected | The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation.<br>ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant. While discussions continue, ECC highlights that the highways mitigation has not yet been agreed.<br>Refer to points raised on the CWTP in ECC's LIR.(REP1-161)<br>ECC welcome further discussion on this point | Under Discussion |

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| | | to use a monitoring and reporting system to monitor the number of construction vehicles using the PARs between the sites and the SRN/MRN.<br>The Applicant will continue discussions with ECC to agree monitoring, management and mitigation. | | |
| **EIA – Baseline Conditions** | | | | |
| ~~3.11.6~~3.1 1.13 | Baseline conditions and receptors | ~~The baseline conditions and receptors for Traffic and Transport are presented in **Section 16.5** of **Chapter 16 (Traffic and Transport)** of the **ES [APP-271]**. The baseline conditions and receptors presented are considered appropriate.~~<br>**The Environmental Statement (ES) Chapter 16: Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. A review of the list of committed developments to be considered provided by Essex County Council on 27th August 2025 (post DCO submission) has been undertaken. The Applicant has also been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs that should be considered. Where this review identifies the potential for new or different | A Technical Note was received on 23rd April 2026 relating to traffic modelling which we understand includes a review of committed development at relevant junctions. ECC to reviewand provide comment to the Applicant<br>ECC would refer to 3.11.7 and 3.11.10 for its response and concerns regarding the impact on school receptors.<br>~~Applicant to review comments provided on 27th August 2025 on committed development~~<br>~~Consideration of school activity, personal injury clusters, PRoW and pedestrian routes on narrow footways on PARs.~~<br>~~Pinch points/traffic calming.~~With regard to environmental impacts on the PARS, ECC awaits the outcome of the Applicants review but welcomes the opportunity to continue the discussion on necessary extent of mitigation | Under Discussion |

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| | | significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination at Deadline 4.<br><br>Schools in Essex were considered within **the 6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-271].** Where schools are directly located adjacent to a construction route e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management Plan [Revision B].** This mitigation was considered appropriate as there may be potential risk of direct interaction between construction HGVs and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school.<br><br>**6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** undertook a review of all Primary Access Routes (PARs) to assess pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. This included locations where PRoWs connected to the PAR. Where required, additional mitigation has been proposed within the **7.3 Outline Construction Traffic Management Plan [Revision B]** Tables 5.6, 5.7 and 5.8. This includes: | | |

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| | | • Providing construction vehicle drivers with an information pack which will provide details on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway.<br>• Ensuring adjacent vegetation is maintained to keep verges clear.<br>• Placing warning signs.<br>~~National Grid will continue to engage with ECC on this matter.~~**The Environmental Statement (ES) Chapter 16: Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. The Applicant is currently reviewing all PARs within Essex to understand whether further mitigation is required. In addition a review of the latest three year personal injury data post COVID is being undertaken to identify any new collision clusters. The Applicant will discuss the outcome of this review with Essex County Council. | | |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |

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| 3.11.14 | Embedded mitigation | The methodology for assessing Traffic and Transport was outlined through the **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate which stated that PARs should be assessed within **the 6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-275].**<br>The comment referring to diversion routes and road closures is covered in Item 3.11.72 below. | This point on methodology referred to here can be agreed | Agreed |
| ~~3.11.7~~3.11.15 | Embedded mitigation | ~~Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in **Section 16.6** of **Chapter 16 (Traffic and Transport)** of the **ES [APP-271].** This includes the **Outline CTMP** (document reference 7.3) which includes all relevant construction related mitigation measures and traffic routing. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~<br>The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of | ~~The details provided at Section 16.6 of the ES are agreed. However, the details in the Outline CTMP referenced need further discussion:~~<br>~~ECC to review proposed diversion routes on public highways when further information has been provided as follows: Existing baseline traffic on diversion route, existing baseline traffic on the route that is to be temporarily closed, and proposed construction traffic (volume and traffic makeup).~~<br>Further discussion on monitoring commitments and requirements in CTMP.<br>The transport assessments assume that construction workers will travel to/from the site outside of the highway network peak hours. ECC's concerns about this are far reaching and include whether this will be adhered to during the autumn/winter seasons with the prevailing weather and reduced daylight hours, and how this would be monitored and managed. Further detail is needed in the CTMP to show how the | Under Discussion |

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| | | worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management Plan [REP3-028]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [REP3-028]**.<br>As noted in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, should the construction periods of other nearby projects overlap with the construction phase of the Project, discussions would be undertaken to identify opportunities to minimise the impact of the overlapping construction workforce vehicle movements on the highway network. This could include coordinated measures such as a minibus or shuttle service from local public transport hubs. Further detail will be included in the final Construction Worker Travel Plan.<br>~~National Grid will continue to engage with ECC on this matter.~~As also stated in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel | construction work would operate (shift patterns etc) within these defined hours and more surety on how this would be enforced.<br>ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant.<br>~~Extraordinary maintenance on local highway network including carriageway and structures (over and above the road condition defects commitment)~~<br>~~Further detail needed on shift patterns and how defined hours for construction workers assumed in the ES are managed and enforced.~~<br>~~Commitment to reducing freight by road including measures and reference to Multi Modal Strategy considerations.~~<br>~~Commitment to monitor and review the number of vehicles in the ES, and interventions where there is an increase in vehicles.~~<br>~~Wider commitment to engaging with the public.~~ECC have requested that the CWTP includes a firm commitment to providing a mini-bus. The Applicant has suggested in their latest response that the Contractor will review this when details of the workers are known. However, ECC believe this commitment can be included now as a key principle because wherever the workers are coming from there will be a need for a mini-bus to reduce vehicles coming to the site – for example, picking up from clusters of postcodes and/or key public transport nodes. | |

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| | | Plan Coordinator (TPC) will act as mediator for anyone interested in car sharing. | | |
| 3.11.16 | Embedded mitigation | The Applicant notes this request and will enter into discussions with Essex County Council on the subject of emergency callouts that could reasonably be attributed to the Project. | Details on the approach to extraordinary maintenance have been provided in the Local Impact Report. ECC await confirmation from the Applicant as to whether this is accepted.<br>ECC welcomes further discussions on the subject of emergency callouts. | Under Discussion |
| 3.11.17 | Embedded mitigation | The Applicant notes this request and will continue to engage with Essex County Council on this matter. | Further detail needed on shift patterns and how defined hours for construction workers assumed in the ES are managed and enforced.<br>ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant.<br>ECC welcomes further discussions on the subject of emergency callouts. | Under Discussion |
| 3.11.18 | Embedded mitigation | **7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]** provides detail of the assessment undertaken by the Applicant, to reduce the amount of distance travelled on road by freight vehicles. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of these being used to source materials where possible. The Applicant has committed to engage with the Developer's Forum and is happy to discuss with other developers the opportunities to reduce long distance road freight deliveries.<br>The front-loaded scenario was included within the assessment detailed in **7.11 Transport** | ECC welcomes the commitment to engage with the Developers Forum but is seeking a commitment in a relevant document to reduce the amount of distance travelled on road by freight vehicles and a multi modal strategy. It is important that this commitment is readily accessible to the Contractor to consider in more detail to determine what is feasible for Norwich to Tilbury.<br>ECCs points on the CTMP have been raised at 3.11.5 and 3.11.7 | Under Discussion |

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| | | **Assessment [APP-333].** This was completed to understand if any additional mitigation, above the 'just-in-time' scenario was required on road links from the Ports to the Primary Access Routes (PARs). The shorter timeframe in the front-loaded scenario resulted in higher impacts on the PARs but experienced over shorter periods of time. The Applicant and Main Works Contractor(s) will continue discussions with the Local Highway Authority when additional information on sourcing is available. The monitoring and management principles detailed in **7.3 Outline Construction Traffic Management Plan [REP3-028]** are applicable to either scenario, with the Main Works Contractor(s) monitoring the number of HGVs accepted into site. The Applicant will adhere to the National Policy Statement EN-1 (2024),paragraph 5.14.13 requirements and will continue to engage with Essex County Council during the development of material sourcing. The Applicant does not consider the **7.3 Outline Construction Traffic Management Plan [REP3-028]** to be the appropriate document for securing this requirement. | | |
| 3.11.19 | Embedded mitigation | The Applicant has stated within the **7.3 Outline Construction Traffic Management Plan [REP3-028]** 'Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary' (paragraph 5.4.17). | The Applicant has included a commitment to monitor construction traffic. However, ECC believe there needs to be confirmation in the Outline CTMP (REP 3-028) to:<br>• review the monitored levels of traffic against the specific number of vehicles | Under Discussion |

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| | | The **7.3 Outline Construction Traffic Management Plan [REP3-028]** additionally states 'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the [Primary Access Routes] between the sites and the [Strategic Road Network/Major Road Network]' (paragraph 6.2.6). It is expected that the monitoring of the construction vehicles will form part of the reporting to the Local Highway Authority. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [REP3-028].** | assessed in the ES; and<br>• to include a list of interventions that would be considered by the Contractor if the review shows the monitoring levels are above the assessed levels .<br>Refer to 3.11.5 for points raised on the CTMP that are relevant. As already identified by ECC it is important that there is a commitment to monitor and review the number of vehicles in the ES and to include interventions where there is an increase. This is on the basis that we have agreed the traffic generation subject to the assumptions underpinning it. We therefore need to have some comfort that there is some accountability if the numbers were to be increased above what has been assessed through the DCO. | |
| 3.11.20 | Embedded mitigation | Numerous communication channels are set out in the **7.3 Outline Construction Traffic Management Plan [REP3-028]**:<br>• Community Liaison Officers will be appointed to engage with key stakeholders, local businesses and the community.<br>• Community Liaison Officers to regularly inform the local community, including notification of heavy traffic periods and be aware of planned community events that may interface with construction operations.<br>• Contact phone number (helpline) provided to the public to raise concerns and complaints. These will be listed in a | Wider commitment to engaging with the public.<br>ECC welcomes the measures identified but considers further measures are required to be set out in the CTMP:<br>• VMS boards at key locations<br>• Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area. | Under Discussion |

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| | | register by the MWC, alongside a record of responses and actions taken to address each item.<br>• Communication sent to the public through letters and emails, detailing the extent of the works and any related traffic management measures (which may impact the community).<br>• Details on proposed traffic management is anticipated to be made available on the Project website.<br>• Specific requirements for works in highways will outline the communications expectations for road works associated with the Project.<br>In addition, Section 2 of **7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public Information [APP-305]** details the complaints procedure that stakeholders can follow to report any complaints associated with the construction of the Project. | | |
| ~~3.11.8~~3.1 1.21 | Standard mitigation | Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in **Section 16.6** of **Chapter 16** (**Traffic and Transport**) of the **ES [APP-271]** and set out in the **Outline CoCP** (document reference 7.2) **[APP-300].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | As above for embedded mitigation~~.~~ in relation to keeping members of the community, local businesses and local stakeholders informed of the works.<br>The CWTP is not yet agreed and forms part of the standard mitigation proposed.<br>The Outline CTMP is not yet agreed and forms part of the standard mitigation proposed. Note points identified in the ECC Response to | Under Discussion |

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| | | National Grid will continue to engage with ECC on this matter. | Inspector's Questions, Q1 (REP3-078) and replicated above at items 3.11.5-7. | |
| ~~3.11.9~~3.11.22 | Additional mitigation | **The Environmental Statement (ES) Chapter 16: Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. =Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. National Grid will continue to engage further with ECC where ECC has noted areas where it considers that further mitigation may be required.<br>Section 5.9 of **7.3 Outline Construction Traffic Management Plan [REP3-028]** details the proposed mitigation measures on PARs across the project.<br>With specific regard to temporary alterations to PRoW connections to the highway network resulting from PRoW diversions, National Grid has engaged with Essex County Council and through this engagement the following eight locations have been highlighted for further consideration and will be subject to Road Safety Audits at the relevant stages of the design and construction process:<br>• Langham 16 (Eastern End) | Including mitigation for all PRoW that link onto or cross the PARs<br>Mitigation for narrow footways on PARs<br>Mitigation for road safety issues on PARs<br>~~Junction mitigation~~<br>Crossing facilities/pinch points<br>It is proposed that the extent of mitigation for the narrow footways, and PRoW that link onto or cross the PARs are included in the Road Safety Review which involves driving the PARs prior to construction starting. In this way the routes are considered based on the latest information.<br>It was discussed that the pinch point identified by ECC on Spa Road is being considered further by the Applicant – ECC await further detail.<br>~~Construction traffic restrictions where school activity exists on PARs.~~The form and scope of the road safety review is to be discussed in more detail. | Under Discussion |

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| | | • Langham 16 (Western End)<br>• Great Tey 36<br>• Great Tey 38<br>• Great Tey 50<br>• Great Waltham 74<br>• Stock 37<br>• ~~The consideration of additional mitigation measures are presented in **Section 16.6** of **Chapter 16** (**Traffic and Transport**) of the **ES [APP-271].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~ West Hordon 69. | | |
| 3.11.23 | Additional mitigation | **7.11 Transport Assessment [APP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management Plan [REP3-028]** 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 optimisation. The Applicant will continue to liaise with Essex County Council on the | A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant. | Under Discussion |

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| | | suitability of these measures for mitigating the temporary construction impacts.<br>As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, 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. | | |
| 3.11.24 | Additional mitigation | Schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and Transport [APP-271].** Where schools are directly located adjacent to a construction route, e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management Plan [REP3-028]**. This included a review of all proposed schools identified during the review of committed developments.<br>This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There | Construction traffic restrictions where school activity exists on PARs. Note this point is dealt with at 3.11.7 and 3.11.10 above.<br>In its LIR (REP1-161) ECC have raised concerns around activity concentrated on the PARs in the vicinity of the schools. ECC suggested on site observations are undertaken by the Applicant to understand how the school children and parents moved in the area around the school as this is key to understanding the impacts of the potential interactions with the HGVs.<br>In summary, it can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to | Under Discussion |

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| | | may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school.<br>A review of other existing schools where Essex County Council has raised concerns has been carried out. From our review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as detailed below:<br>1) Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic<br>2) Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic<br>3) Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two | the school drop off/pick up times.<br>Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR) | |

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| | | weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic<br>4) Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing. | | |
| **EIA – Assessment Conclusions** | | | | |
| 3.11.25<br>~~3.11.10~~ | Construction effects - WCH | **6.16 Environmental Statement** (~~**Residual Effects**~~**ES**) ~~of~~ **Chapter 16** (~~-~~ **Traffic and Transport**~~) of the ES~~ **[APP-271]**~~. The assessment of effects during construction presented is considered appropriate~~ assessed the likely traffic and transport impacts along those roads forming the Primary Access Routes, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and severance. Additional information for route-wide highway mitigation proposals is presented in **the 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320 inclusive]**. See above (**ID 3.11.24**) in relation to the impact on schools within the vicinity of the PARs. National Grid will continue to engage further | There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route.<br>Impacts on pedestrians on narrow footways in rural locations along the PARs.<br>Impacts on pedestrian's crossing along key desire lines along the PARs<br>~~Effects~~Comments at ~~existing traffic calming features on Spa Roa, Witham in relation~~3.11.22 are relevant to ~~accommodating HGV movements~~this point and the matter is being considered further by the Applicant.<br>ECC await outcome of the review | Under Discussion |

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| | | with ECC where it has noted areas where it considers that further mitigation may be required.<br>**The 7.3 Outline Construction Traffic Management Plan [REP3-028]** whose purpose is to monitor, mitigate and manage the impacts around construction traffic. Section 5.9 of **7.3 Outline Construction Traffic Management Plan [REP3-028]** details the proposed mitigation measures on PARs across the project, including on Spa Road. | | |
| 3.11.26 | ~~The assessment of~~Construction effects ~~during construction is presented in **Section 16.7** -~~ WCH | The Applicant will continue discussions with Essex County Council regarding the interface of the Project with any new schools that are linked to new developments. | Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations.<br>~~PAR 50 – Table A16.4.5 in Document 6.16~~Comments at 3.11.22 are relevant to impacts on existing school locations.~~A4 states mitigation has been implemented~~ Wording in the CTMP needs updating to ~~reduce magnitude of impact but nothing has been defined. Discuss potential mitigation (possible controlled crossing at Robjohns Road/Westway/Retail Access).~~<br>reflect that the Contractor will continue discussions with ECC regarding impacts ~~Details of effects~~ on ~~bus passenger delay below 4 weeks including school buses~~any new schools. | Under Discussion |
| 3.11.27 | Construction effects – Spa Road | The location noted on Spa Road in Witham is identified in **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative** | Effects at existing traffic calming features on Spa Road, Witham in relation to accommodating HGV movements. | Under Discussion |

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| | | **Highway Mitigation Plans [APP-317]** (Section E, Sheets 5 and 6, Constraint E7). This indicates that it is proposed for street furniture to be removed from the location temporarily in order to accommodate the design vehicle movements. Mitigation in the form of an appropriate traffic management arrangement (layout) will be agreed with the Local Highway Authority and put in place to replace the street furniture temporarily removed. | It is understood the Applicant is reviewing this particular location. ECC expect to have further discussion when this review has been completed. | |
| 3.11.28 | Construction effects – PAR 50 | For PAR 50 A1016 Waterhouse Lane/A1016 Rainsford Lane the mitigation Table A16.4.5 refers to should have stated that within the CTMP the Driver information pack will identify locations where there may be a higher number of cyclists and pedestrians on or crossing the carriageway. Along PAR 50 there would only be a 2% increase in traffic as a result of the Project. The assessment for severance on this PAR therefore found there to be no significant effects for WCH. | Agreed | Agreed |
| 3.11.29 | Construction effects - PRoW | The Applicant will engage further with Essex County Council on this matter. | ECC welcomes the commitment to further engagement on the outstanding matters regarding potential mitigation for PRoW interactions with the highway. | Under Discussion |
| 3.11.30 | Construction effects – bus passenger delay | The assessment of bus passenger delay presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been undertaken using all | ECC would like a stronger commitment in the CTMP that the Contractor will undertake early engagement with the bus operators and ECC on how to accommodate diversions or delays as a result of construction works. | Under Discussion |

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| | | identified bus services including school buses.<br>**7.3 Outline Construction Traffic Management Plan [REP3-028]** sets out mitigation measures to minimise potential impacts on public bus services.<br>The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption is minimised. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operations.<br>**7.11 Transport Assessment [APP-333]** details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority.<br>The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan. | | |
| | Construction effects – Fear and intimidation and Amenity | The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment | ECC believes that site conditions have not adequately been considered, in particular, the effective footway width (e.g. PAR 39, PAR 41 and PAR 51).<br>A qualitative review of fear and intimidation along Primary Access Routes (PARs) is requested alongside the IEMA thresholds is | Under Discussion |

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| | | of Traffic and Movement (2023)[2]. This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. For example, for PAR 37 A1124 Halstead Road mitigation has been proposed within the **7.3 Outline Construction Traffic Management Plan [REP3-028]** to address the impact on Amenity and Fear and Intimidation. This included a driver information pack which will identify locations where pedestrians may be walking either on a verge or carriageway, ensuring adjacent vegetation is maintained to keep verge clear and allow the full width of footway to be utilised, and placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway. For PAR 41 there are verges of various widths located alongside the carriageway through rural sections and with limited trip attractors apart from Public Rights of Way (PRoWs); where pedestrians are likely to cross the carriageway to reach the opposite PRoW, it is unlikely that pedestrians would walk along the PAR itself | therefore requested.<br>ECC suggest that the Applicant reviews all the PARs to ensure all locations have been appropriately assessed. This Road Safety Assessment would pick up all the locations that require siding out or cutting back of vegetation. If this is agreed with the Applicant then this should be included in the CTMP as a commitment. | |

[2] Institute of Environmental Management and Assessment (IEMA) (2023) *IEMA Guidelines: Environmental Assessment of Traffic and Movement*

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| | | which has a speed limit of 50 mph. Within the urban areas footways are provided with small sections of low level vegetation encroachment from adjacent verge. The residual construction significance of effects would therefore be slight adverse, temporary, and not significant. For PAR 42 and 43 there are a few localised short sections of footway that are narrowed by existing low level vegetation / encroachment from an adjacent verge that could be utilised. The increase in construction traffic on these PARs is notably low (17 HGVs an hour – 9 in each direction). The residual construction significance of effects is therefore considered to be slight adverse, temporary, and not significant.<br>The Applicant will continue to engage with Essex County Council on this matter and will identify where further mitigation has been proposed e.g. Vegetation clearance/'siding out' of existing footways and maintenance of verges. | | |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| ~~3.11.11~~3.11.32 | Outline CoCP | The **Outline CoCP [APP-300]** includes all relevant construction related mitigation measures specified in **Chapter 16** (**Traffic and Transport**) of the **ES [APP-271]** and is appropriate for managing construction impacts from the Project.<br>Meeting held on 9th October to agree on the structure for the **Outline CoCP [APP-300].**<br>National Grid will continue to engage with ECC | Discussion related to 3.10.7 - 3.10.10 | Under Discussion |

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| | | on this matter. | | |
| | Construction effects | The **7.11 Transport Assessment [APP-333]** provides the assessment of the junctions along PARs 50 and 51 at Chelmsford and PAR 59 at Billericay. On those junctions that are forecast to operate at or over capacity on the future baseline scenarios during the worst-case peak period, there may continue to be some level of impact outside of that period. However, typically there is only a marginal impact upon capacity due to the addition of the Project construction traffic flows over the existing and/or future baseline scenarios. The Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower.<br><br>The results of the modelling of Site 40 shows that the junction currently operates already over capacity during the PM peak hour and there is no predicted change in junction performance or state as a result of the Project construction flows with a change of the RFC from 0.88 to 0.93 in the AM peak and 1.07 to 1.12 in the PM peak hour. However, there is a proposal to signalise this junction as part of the planning application Colchester Northern Gateway South (reference 190665) that would form part of the future baseline scenario. The Applicant will continue to engage with Essex County Council and National Highways on this matter. | The latest position is set out in the Response to Local Impact Report (REP 2-030):<br><br>PARS 50, 51 and 59 are described as having a similar level of traffic over a longer period (4 months) as to the one-week period. The level of impact for these links are defined as "significant" in Table A16.4.2 of the Appendix 16.4 Environmental Statement (APP-275). The Applicant has downgraded the impact on the basis that the worst case is for one week, whereas the impact will be same for 4 months as traffic flows are similar. It is unclear how the level of impact is reduced outside of the construction peak period of one week when the traffic flows outside of the construction peak period for four months are similar. | |
| **Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance** | | | | |

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| ~~3.11.12~~3.11.32 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in **Chapter 3** of the **TA** (**document reference 7.11**) **[APP-333].**<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. | Agreed | Agreed |
| **Transport Assessment – Approach and Methods** | | | | |
| ~~3.11.13~~3.11.33 | Study Area | The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within **Section 2.21** (**Transport Assessment Study Area**) of the **TA** (**document reference 7.11**) **[APP-333]**. The Study Area is considered appropriate for the assessment. | The study area is agreed. | Agreed |
| ~~3.11.14~~3.11.34 | Multi-modal Strategy | A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within **Appendix G** (**Multi-Modal Transport Report**) of the **TA [APP-340]**.<br>The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement | The multi modal assessment is considered appropriate. | Agreed |

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| | | (NPS) for Energy EN-1 (2023). | | |
| ~~3.11.15~~3.11.35 | Junction Capacity Assessment Methodology | Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented in **Section 6.9** (**Construction Traffic Assessment Methodology**) of the **TA** (**document reference 7.11**) **[APP-333].** This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate. | Agreed | Agreed |
| ~~3.11.16~~3.11.36 | Junction Modelling | The methodology used for undertaking junction assessments is presented in **Section 6.9** (**Construction Traffic Assessment Methodology**) of the **TA** (**document reference 7.11**) **[APP-333]**. The assessment methodology used is considered appropriate. | Accept use of JUNCTIONS 10 and LINSIG industry standard software for the junction modelling. | Agreed |
| ~~3.11.17~~3.11.37 | Assessment of WCH | ~~The assessment of WCH impacts as a result of the Project is presented in **Section 7.4** (**Walkers, Cyclists and Horse riders network**) of the **TA** (**document reference 7.11**) **[APP-333]**. This is based on the assessment undertaken within **Section 16.7** (**Residual Effects**) **[APP-281]** and **Appendix 16.4: Traffic and Transport Construction**~~ | Note the TA reference is 7.16 (not 7.4)<br>There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route. Note details of PAR 39, 41 and 51.<br>Impacts on pedestrians on narrow footways in rural locations along the PARs. Examples | Under Discussion |

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| | | ~~**Effects** of **Chapter 16 - Traffic and Transport (document reference 6.16.A4) [APP-279].** The assessment methodology used is considered appropriate.~~<br>Discussion related to **ID 3.11.25** to **ID 3.11.27**<br>National Grid will continue to engage with ECC on this matter. | include PARs 37, 41-43. Further review of rural lanes with narrow footways on PARs<br>Impacts on pedestrian's crossing along key desire lines along the PARs.<br>Effects at existing traffic calming features on Spa Roa, Witham in relation to accommodating HGV movements (PAR 43).<br>Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations.<br>Note the above points still need to be agreed and ECC welcomes further engagement on this matter | |
| ~~3.11.18~~3. 11.38 | Impact on Parking | ~~The methodology for the assessment of impact to on-street parking is presented within **Section 6.5** (**on Street Parking**) of the **TA** (**document reference 7.11**) **[APP-333]**. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.~~<br>~~National Grid will continue to engage with ECC on this matter.~~Within the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **7.11 Transport Assessment [APP-333]** parking impact was assessed using standard criteria but was also assessed on a site by site basis reviewing each location's characteristics. Within The **7.11 Transport Assessment [APP-333]** locations where temporary parking restrictions | Discrepancies between text in TA and TRO Schedule for on street parking restrictions to be discussed.<br>~~Details of how the parking provision for construction worker vehicles will be defined, monitored, managed to ensure there is sufficient parking provision.~~<br>~~The threshold in the ES for parking/loading analysis is not accepted.~~<br>~~Impact on HGV driver facilities.~~ECC welcomes the review by the Applicant and awaits the changes in the ES and TA. | Under Discussion |

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| | | will be required are identified. A review against Schedule 13 within the **3.1 Draft Development Consent Order [APP-056]** found that there are discrepancies. A review of this will be undertaken and the Environmental Statement and Transport Assessment amended to reflect this change. | | |
| 3.11.39 | Existing road side facilities | The Applicant has provided in **8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]** a detailed response to paragraph 6.3.8 of the **Relevant Representation by Essex County Council [RR-1083].** With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter with Essex County Council. | Discussions to be undertaken on surveys for existing road side facilities. Note suggested text for CTMP in relation to this point as set out in our response to ExQ1 (REP3-078 ).<br>The Applicants response to this point in (8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]) is noted. ECC suggested text for inclusion in the CTMP in relation to this point as set out in our response to ExQ1 (REP3-078) at TT 1.36 and a response on this is awaited. | Under Discussion |
| 3.11.40 | Impact on parking | As defined in **the 6.19 Scoping Report [APP-296]**, the assessment criteria and magnitude of parking impact is based on the number of spaces lost for any period over four weeks. The assessment in the Environmental Statement indicates that the suspension of parking is expected only during arrival/departure of AIL vehicles and is therefore short-term (significance of effect has been established as not significant). Given the duration of the impact and the type of parking affected (e.g. informal kerbside parking), parking surveys were not deemed necessary. National Grid considers that parking surveys | Note comments above at 3.11.9 | Not Agreed |

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| | | would not materially affect the assessment findings, and the resulting impact of the parking suspension. | | |
| 3.11.41 | Existing roadside facilities | A detailed CTMP will be developed and approved by Essex County Council post consent under Requirement 4 of Schedule 3 to the **3.1 Draft Development Consent Order [Revision C]**. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Essex. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Essex will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site.<br>With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter | Impact on HGV driver facilities.<br>Note comments on item 3.11.39<br>The Applicants response to this point in (**8.4.1 Applicant's Comments on the Relevant Representations [REP1-132])** is noted. ECC suggested text for inclusion in the CTMP in relation to this point as set out in our response to ExQ1 (REP3-078) at TT 1.36 and a response on this is awaited | Under Discussion |

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| | | with Essex County Council. | | |
| 3.11.193.11.42 | Road Safety | An assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in **Section 4** (**Baseline Conditions**) of the **TA** (**document reference 7.11**) **[APP-333].** Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics.<br>Areas where potential road safety issues have been identified, as set out within **Section 7** (**Transport Assessment**) of the **TA** (**document reference 7.11**) **[APP-333],** will be highlighted within the Driver's pack as part of mitigation measures secured within the **Outline CTMP** (**document reference 7.3**) **[APP-309]**. The assessment methodology used is considered appropriate.<br>The Applicant assessed the impact of the Project on the Primary Access Routes (PARs) and set out **in 7.3 Outline Construction Traffic Management Plan [REP3-028]** its proposed mitigation measures, which it considers to be sufficient and proportionate.<br>The Applicant is considering the new information provided in the LIR (road safety improvements recommended by Essex | Under discussionDiscussion – ECC have a number of locations on the PARs that the applicant needs to consider. ECC to provide background to the schemes and costings for the Applicant to review. | Under Discussion |

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| | | County Council (ECC) in relation to the Project). The Applicant will continue to work with ECC to understand the scale of each scheme, the relationship to the Project including timescales, the priorities and contributions requested.<br>1. Botney Hill Road/Farm Access – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>2. B1002 (between Ingatestone and Margaretting) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>3. Ongar Road (near Hanging Gardens Nurseries) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>4. Roxwell Road/Vicarage Road – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>5. B1018 nr Temple Barns – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.<br>6. A134 Nayland Road, Horkesley – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC to confirm | | |

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| | | the speed limit reduction that it is seeking.<br>7. Wick Lane/Dead Lane – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>8. A129 – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.<br>9. A414 Three Mile Hill (off A12) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.<br>10. Margaretting – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.<br>11. Cuckoo Wood (A131) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.<br>12. ~~National Grid will continue to engage with ECC on this matter.~~Galleys Corner – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. | | |
| 3.11.43 | Road Safety – | The Applicant assessed the impact of the | ECC have funding to deliver these works and | Agreed |

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| | Road Safety Scheme on A1060 Roxwell Road | Project on the A1060 Roxwell Road and set out in **7.3 Outline Construction Traffic Management Plan [REP3-028]** its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant is now in discussions with Essex County Council regarding the potential new road safety scheme for the A1060 Roxwell Road that Essex County Council has highlighted in its LIR. The Applicant is also reviewing the relationship of the safety scheme to the Project. The Applicant will continue to work with Essex County Council to understand the commitment that Essex County Council is seeking in relation to the A1060 Roxwell Road. | so funding for this scheme is no longer required. | |
| **Transport Assessment – Mitigation Measures** | | | | |
| 3.11.44 | Junction Mitigation Measures | Traffic data and modelling files have been provided to ECC for review to allow for mitigation to be agreed. A technical note is to be provided to ECC outlining the findings of the updated modelling for those junctions where ECC raised concerns that the baseline scenario models presented in the **7.11 Transport Assessment [APP-333]** did not appear to accurately reflect baseline operation (as expected by ECC) or where the future baseline highway layout will be changed as a result of improvements provided by other committed developments. The modelling and traffic flows for these will be provided to ECC for review. Further engagement with ECC to be arranged to discuss modelling results and | Junction mitigation to be agreed. Same comments as per ES as both documents are related.<br>Note comments in 3.11.23.<br>A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant. | Under Discussion |

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| | | all mitigation. | | |
| | **Site 38** | The assessment of the junction modelling of Site 38 – Ardleigh Crown Interchange and Site 47 - A120 Coggeshall Road / Great Tey Road is presented in **7.11. Transport Assessment [APP-333].** Both junctions are expected to operate over capacity in the future scenarios that were modelled: future baseline with committed developments and future baseline with committed developments and the Project. Mitigation to reduce queues and delays has been investigated for both junctions but not yet agreed.<br>The Applicant will continue to engage with National Highways and Essex County Council to discuss and agree the junction capacity mitigation measures at these sites. This will be documented in this Statement of Common Ground as well as in **5.9.20 Draft Statement of Common Ground - National Highways**. | *As set out in ECC's LIR (REP1-161) "The highest queue is on the A120 (eastbound) at Ardleigh Crown Interchange with an increase of 25 vehicles both during the peak of construction and the 85th percentile peak. The existing junction is already congested based on the output included in Appendix H.4 of the Transport Assessment. Additional queues on Tey Road are shown to be made up of 18 vehicles (12 left and 6 right) in the AM peak and minimal in the PM peak during peak construction, and 7 vehicles (5 left and 2 right) based on 85th percentile flows. However, considering this is a rural lane with existing queues (and future base flows) of around 1-2 vehicles, the effect is likely to be noticeable by regular users – particularly in the AM peak during the peak of construction."*<br>*This position remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed. .* | Under Discussion |
| ~~3.11.20~~ | ~~Mitigation Measures~~**Sites 48, 73, 69, 71, 74 & 82** | ~~Mitigation measures include embedded, standard and additional mitigation identified within **Section 2.2 (Project Description)** of the **TA (document reference 7.11) [APP-333]** and as reported within **Section 16.6** of **Chapter 16 (Traffic and Transport)** of the **ES [APP-271].** This includes the **Outline CoCP (document reference 7.2) [APP-300], Outline CTMP (document reference 7.3)~~ | *As set out in ECC's LIR (REP1-161) "Table 7.1.21 of the TA (APP-333)) includes junctions where monitoring of the operation of the junction is proposed (with Table 5.9 in the Outline CTMP (APP-309) showing that mitigation is yet to be agreed). ECC would welcome further discussion and confirmation around the principles of monitoring and what will be implemented if the monitoring identifies* | Under Discussion |

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| | | ~~**[APP-309]** and additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate.~~<br>As mentioned in Section 5.9 of **7.3 Outline Construction Traffic Management Plan [REP3-028]**, it is anticipated that the Main Works Contractor(s), in partnership with the Local Highway Authority, will monitor the key junctions on the highway network where temporary or permanent mitigation has not been suggested due to the anticipated limited impact of the Project construction traffic. The junctions where monitoring of the operation of the junction is proposed are identified in Table 5.9 of **7.3 Outline Construction Traffic Management Plan [REP3-028]**. Details of the modelling assessments undertaken at these junctions are presented within Section 7 of **7.11 Transport Assessment [APP-333]**.<br>The Main Works Contractor(s) are proposing to use a delivery management / scheduling system utilising Global Positioning System (GPS) technology. This will allow the Project's Transport Coordinator(s) to record and monitor the number of vehicles passing through those junctions identified where temporary or permanent mitigation has not been suggested. A quarterly report will be prepared by the Transport Coordinator(s) and shared with the highway authority. | *issues at the following locations:*<br>• A120 Braintree Bypass/A131 Great Notley Bypass – monitor operation of junction and temporary signage to warn general traffic of peak hour congestion (Site 48)<br>• A127 Southend Arterial Road/A176 Noak Hill Road – priority junction – monitor operation of junction (Site 73)<br>• A1060 Roxwell Road/Lordship Road – roundabout – monitor operation of the junction (Site 69)<br>• A414 Greenbury Way/Highwood Road – roundabout – monitor operation of the junction (Site 71)<br>• A176 Noak Hill Road/Wash Road – priority– monitor operation of the junction (Site 74)<br>*A129 London Road/Mountnessing Road – priority junction – monitor operation of the junction (Site 82)"*<br>*The commitment to the Developers Forum is welcomed but further information on the monitoring / reporting process is requested*<br>~~Junction mitigation to be agreed. Same comments as per ES as both documents are related.~~ This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed. | |

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| | | ~~National Grid will continue to engage with ECC on this matter.~~The Applicant has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council [**RR-1083**]. The Applicant envisages that the routeing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum. | | |
| | **Site 58 & 63** | **7.11 Transport Assessment [APP-333]** provides details of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. It should be noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** to reduce the number of single occupancy private car trips or flexible working practices.<br>However, the Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. | *As set out in ECC's LIR (REP1-161)* Two junctions that have been modelled which include mitigation in the form of temporary signage where the model predicts theoretical congestion (RFC value is above 1.0) in the AM peak:<br>• Site 58 - A131 Great Notley Bypass/Main Road Roundabout<br>• Site 63- A414 Three Mile Hill/A1114 London Road Roundabout<br>*"ECC considers a better approach would be to restrict development traffic during the AM peak particularly in the short-term worst-case construction peak where impacts are higher. A reduction in development traffic could be introduced alongside temporary signage warning of peak hour congestion and highlighting alternative appropriate routes (to be agreed with ECC) for the longer-term impact."*<br>This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the | Under Discussion |

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| | | The Applicant has and will continue to liaise with Essex County Council on this matter. | Applicant ion this issue is welcomed. | |
| | **Site 63** | The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** for PAR 49 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment.<br>The results of the modelling of Site 63 in **7.11 Transport Assessment [APP-333]** shows that the junction currently operates already at or over capacity in the future baseline scenarios and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 1.02 to 1.10 in the AM peak hour and 0.91 to 0.96 in the PM peak hour.<br>The Applicant will continue to engage with Essex County Council on modelling and mitigation. | *As set out in ECC's LIR (REP1-161) "Link PAR 49 includes mitigation in the form of temporary signage to warn motorists of forthcoming delays (as discussed above in relation to the junction impact at Site 63). As the driver delay for the overall link is determined as severe then ECC considers a higher level of mitigation at the junction of Site 63 is required to reduce the impact"*<br>This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed. | Under Discussion |
| | **Sites 69, 81 & 82** | The Applicant will continue to engage with Essex County Council on modelling and mitigation.<br>The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** | *As set out in ECC's LIR (REP1-161) "Link PAR 51 and 59 both include junctions that are to be monitored. These are mentioned in the previous list of junctions to be monitored but is highlighted here as the links are considered as having a significant impact where mitigation is necessary."* | Under Discussion |

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| | | for PAR 51 and PAR 59 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 2% and 1% respectively) so any increase in HGV movements during construction will show as a large proportional change in the assessment.<br>The Applicant will continue to engage with Essex County Council on modelling and mitigation.<br>In relation to PAR 51, Site 69 is the only junction that operates at or over capacity. The results of the modelling of Site 69 in **7.11 Transport Assessment [APP-333]** shows that the junction currently operates already at or over capacity during the PM peak hour and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour.<br>In relation to PAR 59, the junction modelling for Site 81 indicated that there is not a predicted significant change in junction performance as a result of the Project and the junction would operate marginally over practical capacity in the PM peak hour, with an increase of the Degree of Saturation (Dos) from 91% to 93.1%. A proposal of signal time optimisation would reduce the effects. The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in | This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed | |

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| | | available space to turn from the A129 with the addition of construction traffic. The junction will operate over capacity in the AM peak hour with an increase of RFC from 0.83 to 0.91 and at capacity in the PM peak hour with changes of RFC from 0.87 to 0.88. The Applicant is proposing to monitor the performance of this junction during construction. | | |
| | General | **7.11 Transport Assessment [APP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management Plan [REP3-028]** 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 optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts.<br>As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel Plan Coordinator will capture the actual shift start and end times of | *As set out in ECC's LIR (REP1-161) "ECC is of the opinion that there will be impacts on the local highway network with the level of construction traffic included. Mitigation in the form of restricting construction traffic during the peak hours needs to be explored further along with the use of sustainable transport infrastructure to reduce background traffic and offset impacts. The impacts at these junctions also highlight the importance of controls being in place to ensure that workers do not arrive/depart site during the network peak hours which is a fundamental assumption in the transport assessment undertaken , and that suitable Construction Worker Travel Plan measures for office staff who are assumed to travel in the peak hours, are also secured."*<br>This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed<br>Note comments on the CTMP at 3.11.5-7 which are relevant. | Under Discussion |

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| | | 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. | | |
| **Transport Assessment – Baseline Conditions** | | | | |
| 3.11.45 | Baseline conditions | The Applicant will continue to engage with ECC regarding junction surveys and modelling (see **ID 3.11.3** and **ID 3.11.44** above). The **7.11 Transport Assessment [APP-333]** refers readers to **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** in relation to baseline conditions identified for PARs and the LRN characteristics, existing traffic flows, sensitive receptors, personal injury collision data, bus and rail services, and road sensitivities. National Grid would welcome further engagement on the collision analysis. | This position on this issue remains unchanged and further engagement with the Applicant is welcomed.<br>Refer to items 3.11.7 and 3.11.10 above for receptors<br>Refer to item 3.11.8 above for personal injury collision data.<br>Refer to item 3.11.13 on traffic surveys/modelling. | Under Discussion |
| ~~3.11.21~~3. 11.46 | Baseline conditions | ~~The baseline conditions and sensitive receptors for Traffic and Transport are presented in **Section 4** (**Existing Baseline Transport Conditions**) of the **TA** (**document reference 7.11**) **[APP-333]** and are considered appropriate~~Construction traffic to be generated by the Proposed Project and its routeing has been assessed and is not expected to result in any significant effects on the surrounding | Refer to items 3.11.5-7 above which relates to commitments required in the Outline CTMP.<br>~~Personal Injury Collision Data.~~<br>~~More traffic surveys have been undertaken by the applicant to compare to the baseline and use for model calibration.~~<br>~~Receptors are not included in the TA document.~~<br>~~Existing HGV~~Refer to item 3.4.41 for driver | Under Discussion |

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| | | highway, following the measures identified within the **7.3 Outline Construction Traffic Management Plan [REP3-028].** A detailed Construction Traffic Management Plan (CTMP) will be developed and approved by Essex County Council post consent under Requirement 4 of Schedule 3 of the **3.1 Draft Development Consent Order [APP-056]**. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Essex. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Essex will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site. | facilities. | |
| **Transport Assessment – Future Baseline Conditions** | | | | |
| ~~3.11.22~~3. | Growth Factors | The future baseline traffic on the SRN / MRN | Agreed | Agreed |

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| 11.47 | | has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in **Chapter 5** (**Future Baseline**) of the **TA** (**document reference 7.11**) **[APP-333].** Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate. | | |
| ~~3.11.23~~3. 11.48 | Cumulative Developments | National Grid confirms that a review of all committed developments was undertaken prior to the submission of the **7.11 Transport Assessment (TA) [APP-333]** to the Planning Inspectorate. This submission included the majority of the committed developments subsequently listed by Essex from their review of the draft TA. Where developments were omitted, a review has been undertaken to understand whether they should have been included. It was found that two developments would occur during the Project peak construction period: 19/01725/OUT Land North of London Road Billericay Essex and 23/02807/OUT Land West of Horizon 120 Phase 2 Horizon Boulevard Great Notley Braintree Essex. A review is currently being undertaken to understand the effects of the increase in traffic on the Primary Access Routes and junctions affected. National Grid will engage with Essex following this review.<br>The **7.11 Transport Assessment – Appendix D – Committed Developments [APP-337]** provides an overview of the committed | ~~ECC provided list~~A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development ~~through informal consultation to be considered~~at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant. | Under Discussion |

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| | | developments and transport schemes that were considered in the assessment of traffic on the road links forming the Primary Access Routes (PARs). Against each development a commentary has been provided as to whether it needs to be included within the assessment of traffic and transport.<br>Update to position (April 2026)<br>~~The committed developments included within the cumulative assessment for the future baseline year are presented in **Chapter 5** (**Future Baseline**) of the **TA** (**document reference 7.11**) **[APP-333]**. These have been derived through a review of local authority planning portals and information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.~~The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs.. This review will be published into Examination. | | |
| **Transport Assessment – Trip Generation** | | | | |
| ~~3.11.24~~3. 11.49 | Key Assumptions | Key assumptions associated with the Traffic and Transport assessment are summarised in **Section 16.4** of **Chapter 16** (**Traffic and Transport**) of the **Environmental Statement (ES)**<br>**[APP-271]** and **Section 6.7** of **Chapter 6** of | Note comments for ~~3.10.5~~3.11.5 as both TA and ES use same assumptions~~.~~:<br>• ECC position pending sight of<br>• In ECC's response to ExQ1 (REP3-078) the following wording was provided to deal with | Under Discussion |

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| | | the **Transport Assessment** (**document reference 7.11**) **[APP-333]**. The key assumptions presented are considered appropriate.<br>National Grid will continue to engage with ECC on this matter. | the above assumptions on workers arrival/departure times:<br>• To update paragraph 5.4.17 of the CTMP with: "The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed."<br>• To update Section 2.3 Working Hours to include the following:<br>• Staff working hours will be <<br>• Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs<br>• Table 6.1 at "Monitoring of vehicles and road network" to include:<br>• Monitoring vehicle movements of HGVs and construction workers.<br>• ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and.or community members. We provided some suggestions as follows:<br>• extending the programme of works to reduce the impact of traffic; | |

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| | | | • warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site;and further disciplinary actions as necessary for repeated incidents<br>• closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or<br>• implementing additional shuttle buses to reduce worker traffic.<br>• Update to the list of non-compliance at Section 6.4.1 as follows:<br>• Construction traffic (including workers) operating outside the agreed hours<br>• The list of non-compliance at Section 6.4.1 to include:<br>• Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES<br>• In the response to the applicant's comments to ECC's LIR we included the following points relevant to the CTWP on car occupancy rates and mode share:<br>• ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – | |

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| | | | vehicle occupancy of 2).<br>• ECC does not see why the baseline and future targets could not be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP.<br>• ECC requested that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network.<br>• ECC require the CTWP (APP-311) to include a commitment to the use of a crew vehicle for the overhead line workers travelling from compound to sites.<br>• The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site. | |
| ~~3.11.25~~3. 11.50 | Methodology | The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within **Section 6** (**Methodology**) of the **TA** (**document reference 7.11**) **[APP-333]** is | The methodology is agreed in that it based on other sites. However, this is subject to ~~monitor, manage and mitigate~~ (receiving further detail on mitigation which has not yet been agreed~~.~~ and needs to be informed by experience of | Under Discussion |

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| | | considered suitable and robust.<br>National Grid will continue to engage with ECC on this matter. | other sites<br>ECC welcomes the commitment to further discussion on this issue. | |
| ~~3.11.26~~3.11.51 | Construction Vehicle Trips | Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in **Section 6.3** (**Construction Vehicles Overview**) of the **TA** (**document reference 7.11**) **[APP-333]**. The trip generation is considered appropriate.<br>National Grid will continue to engage with ECC on this matter. | The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet.<br>ECC welcomes the commitment to further discussion on this issue. | Under Discussion |
| ~~3.11.27~~3.11.52 | Construction Workforce Trips | Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in **Section 6.4** (**Construction Staff Overview**) of the **TA** (**document reference 7.11**) **[APP-333]**.<br>An **Outline Construction Workers Travel Plan (CWTP)** has been prepared as part of the DCO application and is contained as an appendix within the **Outline CTMP** (**document reference 7.3**) **[~~APP-309~~REP3-028].** The **Outline CWTP** will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The | The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet. ECC welcomes the commitment to further discussion on this issue. | Under Discussion |

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| | | workforce trip generation is considered appropriate.<br>National Grid will continue to engage with ECC on this matter. | | |
| **Transport Assessment – Conclusions** | | | | |
| ~~3.11.28~~3.11.53 | Overall impact of the Project | The conclusions of the Transport Assessment are presented within **Section 8** (**Conclusion**) of the **TA** (**document reference 7.11**) **[APP-333]**. The conclusions are considered appropriate.<br>National Grid will continue to engage with ECC on this matter. | The mitigation/management and monitoring is not agreed. ECC welcomes the commitment to further discussion on this issue. | Under Discussion |
| **Outline Construction Traffic Management Plan (CTMP)** | | | | |
| ~~3.11.29~~3.11.54 | Project Team Roles and Responsibilities | The Project Teams Roles and Responsibilities are set out in **Section 3** of the **Outline CTMP** (**document reference 7.3**) **[~~APP-309~~REP3-028]**. These are considered to be clear and sufficient for the delivery of the Project. | Agreed | Agreed |
| ~~3.11.30~~3.11.55 | Pre-and Post Construction Surveys | ~~Details of the proposed Pre and Post Construction surveys are set out in **Section 5.2** of the **Outline CTMP** (**document reference 7.3**) **[APP-309]** and connect to the mitigation measures detailed within the **Outline Code of Construction Practice** (**oCOCP**) (**document reference 7.2**) **[APP-300]**.~~<br>~~These pre- and post-construction surveys are considered appropriate for the Project.~~<br>~~National Grid will continue to engage with ECC~~ | Further discussions/commitments needed on regular monitoring of road conditions extraordinary flows and maintenance liability for local highway network (including road and structures).<br>ECC welcomes the commitment to further discussion on this issue. | Under Discussion |

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| | | ~~on this matter.~~The Main Works Contractor(s) will create a record of Primary Access Routes (PARs) as part of the pre-construction conditions surveys of the existing highway network. The pre-construction condition surveys are proposed to be undertaken on all Abnormal Indivisible Load and HGV routes, as detailed in Section 5.2 of the **7.3 Outline Construction Traffic Management Plan [REP3-028]**, with the proposed methodology to be agreed with the Local Highway Authority. The results of these pre-condition surveys will be shared with the Local Highway Authority prior to works commencing, including pre-commencement works relating to the highway. Section 6.2 of the **7.3 Outline Construction Traffic Management Plan [REP3-028]** details how post-construction condition surveys should be undertaken after construction, and the results of these and any remedial works will be discussed and agreed with the landowner and, where applicable, the relevant highway authorities, prior to handover. The point raised by Essex County Council regarding the monitoring road conditions through quarterly observations during the construction period is noted. The Applicant will work with Essex and the Main Works Contractor(s) to agree the condition monitoring approach during construction. | | |
| 3.11.56 | Traffic Management Measures | Traffic Management is set out within Section 5.8 of **7.3 Outline Construction Traffic Management Plan [REP3-028].** The | It is agreed that further discussions on semi-permanent traffic management will be undertaken with the Contractor. | Agreed |

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| | | Applicant's Main Works Contractor is to develop traffic management proposals including signage in accordance with the **7.3 Outline Construction Traffic Management Plan [REP3-028]** which are to be agreed with the Local Highway Authorities.<br>As set out in Section 6.2 of the **7.3 Outline Construction Traffic Management Plan [REP3-028],** regular site checks are required to be carried out across the Project. Table 6.1 lists weekly frequency for monitoring of the road network with Transport Coordinators checking signage is in place. The visibility splays and Traffic Regulation Orders presented in the **3.1 Draft Development Consent Order [APP-056]** have been developed to allow for some flexibility should a more semi-permanent arrangement be appropriate. Further development of traffic management associated with the works will be undertaken by the Main Works Contractor, in consultation with Essex County Council. | | |
| ~~3.11.31~~3.11.57 | Traffic Management Measures | ~~Details of the proposed traffic management measures are set out in **Section 5.8** of the **Outline CTMP** (**document reference 7.3**) **[APP-309]**. These traffic management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts.~~<br>National Grid will continue to engage with ECC on this matter~~.~~ | ~~Further discussion needed around semi-permanent nature of the traffic management measures.~~<br>~~Commitment~~ECC welcome commitment to discuss disruption to bus services (particularly school buses) with bus operator/LHA where routes are diverted with a view to minimising impacts– regardless of duration. | Under Discussion |

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| ~~3.11.32~~3.11.58 | Implementation/ Enforcement | The implementation and enforcement process set out in **Section 6** of the **Outline CTMP** (**document reference 7.3**) **[~~APP-309~~REP3-028]** is considered to be appropriate and adequate for the Project.<br>National Grid will continue to engage with ECC on this matter | Detail and discussion required regarding~~:~~<br>• ~~Monitoring~~enforcement measures that would be implemented by the Contractor if there were issues identified.<br>• ~~Wider community~~ECC welcomes further engagement ~~and AILs~~<br>• with National Grid.~~Developers Forum and collaborative working to minimise cumulative impacts~~ | Under Discussion |
| 3.11.59 | Implementation/ Enforcement | Numerous communication channels are set out by the **7.3 Outline Construction Traffic Management Plan [REP3-028]** to allow for appropriate community engagement]:<br>• Community Liaison Officers will be appointed to engage with key stakeholders, local businesses and the community.<br>• Community Liaison Officers to regularly inform the local community, including notification of heavy traffic periods and be aware of planned community events that may interface with construction operations.<br>• Contact phone number (helpline) provided to the public to raise concerns and complaints. These will be listed in a register by the Main Works Contractor(s), alongside a record of responses and actions taken to address each item.<br>• Communication sent to the public through letters and emails, detailing the extent of the works and any related traffic | Refer to point 3.11.20 which requires the following to be included as a commitment:<br>• VMS boards at key locations<br>• Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area. | Under Discussion |

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| | | management measures (which may impact the community).<br>• Details on proposed traffic management is anticipated to be made available on the Project website.<br>• Specific requirements for works in highways will outline the communications expectations for road works associated with the Project.<br>The Applicant commits to joining and engaging with the Developers Forum to continue and formalise their stated engagement within the **7.3 Outline Construction Traffic Management Plan [REP3-028]** to coordinate the approach to traffic management. | | |
| **Outline Construction Workers Travel Plan (CWTP)** | | | | |
| ~~3.11.33~~3. 11.60 | Policy | The ~~policy context, including legislation and guidance considered in the development of the document is set out in **Section 4** of the **Outline CWTP** (**Appendix B** of the **Outline CTMP**) (**document reference 7.3**) **[APP-311]**. All relevant legislation, policy, and guidance have been identified and appropriately considered to inform the **Outline CWTP**~~Final Construction Worker Travel Plan will be developed by the Main Works Contractor(s), in collaboration with Essex County Council. It is anticipated that the targets developed within the final construction worker travel plan will form part of the baseline expectations. This will take into account the | The Essex Travel Plan Guidance includes the requirement for baseline figure and targets to be included in the CWTP<br>ECC would refer to its response to the Applicants comments on ECC's LIR **[APP_REP3-077]** which stated<br>"ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2).<br>It is unclear why the baseline and future targets | Under Discussion |

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| | | operational status of each site. | cannot be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP." | |
| ~~3.11.34~~3. 11.61 | Site Accessibility Review | The Site Accessibility review is captured within **Section ~~5~~4** of the **Outline CWTP** (**Appendix B** of the **Outline CTMP**) (**document reference 7.3**) [**APP-311]**. This review is appropriate for the Project. | Agreed | Agreed |
| 3.11.62 | Targets, Strategy, and Measures | The Main Works Contractor(s) will develop the final Construction Worker Travel Plan and will engage with the Local Highway Authorities on the appropriate methodologies to encourage construction workers to travel to the site via more sustainable modes. Best practice from other Development Consent Orders will be used to inform this discussion.<br>The location of construction staff is currently unknown. Once this information becomes available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures. | Note item 3.11.61 above for targets.<br>ECC would refer to its response to the Applicants comments on ECC's Reference to LIR **[APP_REP3-077]** which stated:"We request that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network."<br>As part of their commitment to promoting and encouraging sustainable travel and reduced parking as well as reducing single occupancy car use, ECC believe a firm statement (rather than a consideration) to utilising minibuses is necessary and proportionate. This should be included in the CWTP. In this way, the | Under Discussion |

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| | | | commitment will ensure that the Contractor works towards implementing a scheme that is appropriate for the workforce (both shift workers and office staff) – that could mean drop off/pick up at clusters near workforce accommodation and/or sustainable travel hubs. | |
| ~~3.11.35~~3.11.63 | Targets, Strategy, and Measures | Section 7.6 of the **7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]** 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.<br>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 the **7.3 Outline Construction Traffic Management Plan [REP3-028]** 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.<br>~~Targets are set out within **Section 6** of the **Outline CWTP** (**Appendix B** of the **Outline CTMP**) (**document reference 7.3**) **[APP-311]**.~~<br>~~Strategy and Measures are set out within **Section 8** of the **Outline CWTP [APP-311]**.~~<br>~~The construction targets set out are considered to be relevant and achievable,~~ | ~~Detail and discussion required regarding:~~<br>~~Commitment to minibuses.~~<br>~~More detail on how measures will be implemented.~~<br>Parking management.<br>ECC ~~require some~~requires confirmation that there are interventions that can be put in place as mitigation if the assumptions do not come to fruition on mode share and associated parking numbers, number of workers and worker arrivals/departure times.<br>~~Action Plan~~The non compliance procedure sets out how mitigation will be discussed with ECC and the Contractor. ECC would expect some high level potential interventions to be included in the CWTP which would be agreed with ECC. In this way, the Contractor has clarity on the types of interventions that are expected to be agreeable with ECC and allows a starting point for discussions for agreement. | Under Discussion |

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| | | given the present stage of Project development.<br>The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project.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 the **7.3 Outline Construction Traffic Management Plan [REP3-028].** | | |
| 3.11.64 | Targets, Strategy, and Measures | Section 6.3 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** sets out the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the full CWTP) which focuses on the delivery of travel plan measures. | The commitment to an action plan is welcome. However, ECC believe there should be some firm commitments that can be included in an Action Plan within the Outline CWTP. This will set the framework for the Contractor to update and review as part of the detailed CWTP. | Under Discussion |
| 3.11.363.<br>11.65 | Monitoring and Review | The proposed monitoring and review process isMain 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 98** of the**7.3 Outline CWTP (Appendix B of the CTMP) (document reference 7.3) [APP-311]**. This is considered to be suitable and appropriate, given the present stage of Project development**Construction Traffic Management Plan - Appendix B - Outline** | Detail and discussion required regarding:<br>As mentioned in ECC's LIR [REP1161] at paragraph 6.21.10, the monitoring and review should relate to the specific groups of staff so that it can be related back to the assumptions in the initial assessment.<br>• Specific questions on Monitoring frequency.and Review include:<br>• When and how often will the mode share and parking accumulation be collected?<br>• Why is car occupancy not included in the | Under Discussion |

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| | | **Construction Worker Travel Plan [APP-311]**, 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. | data collection as this will be important to understand the level of car sharing?<br>• ~~Details of monitoring~~How will the parking~~.~~ be monitored?<br>• ~~Frequency of review.~~How will off site parking impacts be identified? | |
| **Construction Access Strategy and Design** | | | | |
| ~~3.11.37~~3. 11.66 | Construction Access Approach | The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within **Section 5** of the **Outline CTMP** (**document reference 7.3**) **[~~APP-309~~REP3-028]**. This approach is considered to be suitable for construction traffic for the Project. | Construction access utilising designated routes is an agreed approach. | Agreed |
| ~~3.11.38~~3. 11.67 | Primary Access Route Selection | ~~Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the **Indicative Highway Mitigation Plans** within **Appendix C** of the **CTMP (document reference 7.3) [APP-312 to APP-320 inclusive]**. These have been discussed with Essex County Council during regular engagement meetings since September 2023.~~ | ~~Awaiting highway mitigation and access designs following RSA and DR, and response from ECC.~~ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane | Under Discussion |

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| | | ~~These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the **Outline CTMP [APP-309]**~~Initial responses in reply to the road safety audit findings for highway mitigation and site access points were prepared by the Design Organisation and submitted to the Essex CC LHA as Overseeing Organisation back in July 2025 accompanied by the audit reports, audit briefs and drawings. These Design Organisation responses have since been updated to consider any Overseeing Organisation comments or responses received back, and these updates will be shared with the LHA setting out agreed/further action points in advance of the commencement of the stage 2 detailed design development. | | |
| ~~3.11.39~~3.11.68 | Construction Access and Crossover Design | ~~The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in **Schedule 9 – Access to Works** of the **Draft Development Consent Order [APP-056]** and further shown in the **Indicative Highway Mitigation Plans** within **Appendix C** of the **Outline CTMP [APP-312 to APP-320 inclusive]**. These locations are considered to be suitable for use by the proposed construction traffic as part of the Project.~~<br>The Applicant concurs with Essex County Council's stated position that – where achievable – proposed speed limits should | ~~Awaiting crossover designs following RSA with Designer's Response, and response from ECC.~~ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane | Under Discussion |

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| | | broadly be self-enforcing. The Applicant is also aware of concerns expressed by Essex County Council relating to specific locations where it may not necessarily be practicable to achieve a self-enforcing speed limit, and will continue to engage with Essex County Council and other stakeholders as appropriate with a view to addressing such concerns.<br>The Applicant has sought to include proposals for Traffic Regulation Orders (TROs), including where these relate to reductions in posted speed limits, in support of the safe and effective provision of site access, crossover, and mitigation proposals interfacing with the Public Highway. This approach is outlined in **7.3 Outline Construction Traffic Management Plan [REP3-028].**<br>~~The designs of the proposed accesses in these locations have been based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road Safety Audits (RSAs) have been undertaken for each proposed location, overseen by Essex County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Essex County Council as the Overseeing Authority.~~Designs relating to these locations have been subject to the Road Safety Audit (RSA) process – with oversight from the relevant Local Highway Authorities for each area of the scheme – set out in **7.11 Transport Assessment - Appendix A –** | | |

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| | | **Norwich to Tilbury RSA Strategy [APP-334].** This process included consideration of both posted speed limits and, where available, speed survey information. Survey locations are shown in **7.11 Transport Assessment – Appendix I – Figures [APP-342]** – noting that Project traffic count surveys also included the recording of speed information, as discussed in **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].** On this basis, proposed TROs are considered to broadly account for driver behaviour in a suitable and realistic manner. | | |
| ~~3.11.40~~3. 11.69 | Highway Mitigation Design | Red and orange locations as described in the **7.3 Outline Construction Traffic Management Plan [APP-311]** for indicative highway mitigation were subjected to RSA1. Initial responses in reply to the road safety audit findings for highway mitigation locations were prepared by the Design Organisation and submitted to the Essex CC LHA as Overseeing Organisation back in July 2025 accompanied by the audit reports, audit briefs and drawings.<br>~~Mitigation measures proposed on the Public Highway are described in **Section 5** of the **Outline CTMP [APP-309]**, and are further set out in the following DCO Schedules **[APP-056]**:~~<br>~~• **Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout.**~~<br>~~• **Schedule 6, Part 2 - Street Subject to~~ | ~~Awaiting mitigation plans following RSA, Designer's Response, and ECC response~~ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane | Under Discussion |

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| | | ~~**Temporary Alteration of Layout.**~~<br>~~These are considered to be suitable and sufficient for the delivery of the Project.~~<br>~~Where measures have been identified which may require works outside of the Public Highway (categorised as 'Red' mitigations in **Section 5.9** of the **Outline CTMP** (**document reference 7.3**)~~<br>~~**[APP-309]**, specific designs have been developed for these locations. These designs were discussed with Essex County Council during an engagement session in April 2025, and further to this Stage 1 Road Safety Audits have been undertaken for each location, overseen by Essex County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Essex County Council as the Overseeing Authority.~~ The Design Organisation responses have since been updated to consider any Overseeing Organisation comments or responses received back, and these updates will be shared with the LHA setting out agreed/further action points in advance of the commencement of the stage 2 detailed design development. Yellow and green locations of highway mitigations have not been subjected to RSA1, however, those locations and summary details for each location are set out within **7.3 Outline Construction Traffic Management Plan Appendix C - Guide to the Plans and Master** | | |

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| | | **Key Plan [APP-312]** and the **7.3 Outline Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans - Sections A to H [APP-313 to APP-320].** | | |
| 3.11.70 | Traffic Management | Any required road markings and associated signage will be designed and installed in conjunction with Traffic Signs Manual chapters, and the proposals will be subject to approval from the LHAs prior to construction commencement. | It is agreed that TM will need to be designed and installed in accordance with Traffic Signs Manual chapters and the proposals will be subject to approval through the detailed design process post DCO. | Agreed |
| ~~3.11.41~~3.11.71 | Traffic Management | All temporary construction measures—such as site access points, crossing points, and any highway mitigation works—will be removed upon completion of the project, with all areas reinstated to a condition agreed with the relevant parties.<br>Notwithstanding the above, there may be scope for the relevant local authority to approve a reinstatement condition other than previous condition/use. However, this would be subject to an assessment of environmental effects, landowner agreement and any separate planning permission resulting from a continued use or new end use.<br>~~Traffic Management measures proposed on the Public Highway are described in **Section 5** of the **Outline CTMP** (**document reference 7.3**) **[APP-309]** and further set out in **Schedule 5 - Streets Subject to Streetworks** of the **Draft Development Consent Order [APP-056]**. These are considered to be~~ | ~~Awaiting mitigation plans following RSA, Designer's Response and ECC response.~~<br>~~Commitment that all signage to be placed in highway land is agreed with the highway authority.~~<br>~~Para 5.9.5: The land should be reinstated "where agreed" as there may be situations where the changes to infrastructure can remain rather than be reinstated to its previous condition.~~<br>~~Mitigation measures under discussion.~~<br>~~Designs under discussion.~~On the basis of this commitment, this matter is agreed. | ~~Under Discussion~~Agreed |

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| | | ~~suitable and sufficient for the delivery of the Project.~~<br>~~Approaches to Traffic Management were discussed in principle during engagement session in June 2024, and further specific measures relating to highway mitigation design were discussed during an engagement session in April 2025.~~<br>~~National Grid will continue to engage with Essex County Council as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (ID 3.10.40), and highway mitigation design (ID 3.10.41).~~This matter would be considered outside the development consent process, since it is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order | | |
| ~~3.11.42~~3. 11.72 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | ~~Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the **Traffic Regulation Order Plan (document reference 2.4) [APP-025 to APP-032 inclusive]** and set out in **Schedule 13** of the **draft DCO (document reference 3.1) [APP-056]**:~~<br>~~• **Part 1 - Temporary Restriction of Waiting and Restriction of Speed.**~~<br>~~• **Part 2 - Permanent Restriction of Waiting and Restriction of Speed.**~~<br>~~• **Part 3 - Temporary Restriction of Access.**~~ | ECC welcomes further discussion on this issue Further information is awaited following a meeting in March with the Applicant before ECC can provide comment on the TROs and this is listed together with ECC's main concerns on what has been provided to date is included in ECC's LIR **[REP1-161]** at paragraphs 4.5.104-106. | Under Discussion |

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| | | ~~• Part 4 - Temporary no Overtaking Order. These are considered to be suitable and sufficient for the delivery of the Project.~~<br>The Applicant would welcome further engagement with the Local Highway Authority to discuss the detail, form and durations of the draft Traffic Regulation Orders (TROs) in Schedule 13.<br>The Applicant has conducted traffic and speed surveys in the locations of proposed Site Access Points and Crossover Points. This data has been considered within the design of these locations and the proposed implementation of any speed limit restrictions.<br>During construction of the Site Access Points, Crossover Points and highway mitigation works, there may be works where it is not safe or practicable for the public highway to remain fully available for use. During these limited periods, the Applicant would seek to maintain access through the deployment of traffic management. Should this not be feasible or operationally reasonable, due to factors such as limited existing carriageway width, the Applicant would seek to implement a limited duration closure.<br>In addition, short-term road closures are required for netting activities associated with the overhead line stringing. These closures are of very short duration (hours rather than days) and can occur at night, further limiting potential disruption. | | |

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| | | Due to the limited duration and occasional nature of these potential closures, the Applicant does not consider it appropriate to conduct traffic flow or speed surveys along diversion routes, in line with typical temporary road closure procedures. Given their limited carriageway width, generally the closures will be required on more minor local roads, and therefore it is anticipated that there will be a limited traffic flow impact resultant from these closures. Additionally, the use of diversion routes would not change the existing road speed conditions to trigger the requirement to obtain speed data along these routes.<br>All works will be coordinated with the Local Highway Authority by the Main Works Contractor through the use of the permit scheme.<br>~~National Grid~~The Applicant has and will continue to ~~engage~~work with Essex County Council ~~as the proposed TROs and TTROs are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (**ID 3.10.40**), and highway mitigation design (**ID 3.10.41**)~~regarding the requirement for further survey work in relation to on-street parking. | | |
| 3.11.73 | Traffic Regulation Orders and Temporary Traffic | Traffic Regulation Order (TRO) durations – The works programme is yet to be finalised, along with the requirements of commencement dates, so durations of all | ECC maintains its position stated in its LIR **[REP1-161]** that:<br>• the TRO should include the duration of the | Under Discussion |

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| | Regulation Orders | TROs are unable to be confirmed at this time. | orders so as to fully understand the impacts<br>• ECC refers to its response to the Applicants comments on ECC's Reference to LIR **[APP_REP3-077]**<br>• Paragraph 4.5.106 sets out more detail on the reasoning for the requirement for durations as a standard approach to TRO consultation | |
| 3.11.74 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | The **7.3 Outline Construction Traffic Management Plan [REP3-028]** sets out details and reasoning for consideration by the contractor relating to traffic management and TROs, including references to Local Highway Authority permit scheme, and lengths (distance and duration) of traffic management measures. The Applicant is preparing further information and will continue to engage with the Local Highway Authority on the reasons for the TROs. | Position from Local Impact Report:<br>There should be a statement of reasons for the orders so that we can understand what is trying to be achieved so ECC can review against the necessary specific and relevant orders that are to be implemented and to understand the purpose (for example, restricted access)<br>Full details of ECC's request for further information and main concerns on what has been provided to date is included in our LIR at paragraphs 4.5.104-106.<br>A meeting was held with ECC and NG in March to discuss the TROs and the information required. NG are due to send through further information for review. | Under Discussion |
| 3.11.75 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | The key on **the 2.4 Traffic Regulation Order Plans (Sections A to H) [APP-025 to APP-032 inclusive]** presents in their Legend whether the TROs are either for temporary or permanent traffic regulation measures or restrictions. Additionally, Part 4 of Schedule 13 of the **3.1 Draft Development Consent Order [APP-056]** lists all TROs for the Project that | Having rechecked we can see the legend includes both temporary and permanent TROs. Therefore, agreed. | Agreed |

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| | | relate to permanent traffic regulation measures or restrictions, whereas Parts 1 to 3 lists all TROs relating to temporary traffic regulation measures or restrictions. | | |
| 3.11.76 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | TRO enforcement – Traffic enforcement in Essex is primarily carried out by Essex Police for speed enforcement and enhancing road safety, and by Essex County Council for traffic-related services. Maintaining the TROs – The **7.3 Outline Construction Traffic Management Plan [REP3-028]** Table 6.1 provides indicative timescales and responsibility for monitoring of/checking signage, vehicles and road network. | The TROs needs to be self enforcing through advanced warning signage and traffic management etc. Police have limited resources to carry out enforcement and the scheme is very large. Therefore, the TROS need to be self-enforcing through advanced warning signage and traffic management. This should be included in the CTMP. | Under Discussion |
| 3.11.77 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | The diversion routes have been identified following typical road closure procedures, where diversion routes are of a same or better standard than that to be closed in terms of alignment, carriageway width, height and weight restrictions. | If the weak structures have not been reviewed, we would suggest this is undertaken through our Structures Team to ensure there are no issues with additional traffic using the diversion routes This is on the basis that the diversion route is part of the TTRO Schedule which is to be agreed through the DCO Examination. .<br>Note diversion routes should be based on ECC's functional route hierarchy set out in the Essex Traffic Management Strategy. | Under Discussion |
| 3.11.78 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | National Grid will engage with ECC regarding a proposed mechanism described by ECC in the **Local Impact Report [REP1-161]** for reviewing road closure diversion routes. Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison of the **7.3 Outline Construction Traffic Management** | ECC welcome further engagement on this point. | Under Discussion |

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| | | **Plan [REP3-028]** references use and adherence of Local Highway Authority Permit Schemes, in order to best coordinate the street works required for the Project. | | |
| 3.11.80 | Traffic Regulation Orders and Temporary Traffic Regulation Orders | **The 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]** sets out the reasoning behind decisions for the preliminary designs, being based on 85th percentile speed survey data, site-specific constraints and highway safety considerations together with other measures in combination to determine the suitable design speeds as listed with Schedule 13 of the **3.1 Draft Development Consent Order [APP-056]** for TRO speed restrictions. | The response from the Applicant is agreed on the basis that the designs use 85th percentile speed data or the existing speed limit. | Agreed |
| ~~3.11.43~~3.11.81 | Highway Mitigation Design on National Highways Infrastructure | Further to Matter **ID ~~3.10.41~~3.11.69** (Highway Mitigation Design), it has been identified that the A120(E) / Bentley Road junction (described in **Section 5.9** of the **Outline CTMP [~~APP-309~~REP3-028]**) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this proposed mitigation impacts principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location. | ~~Would~~ECC would expect input into the design but accept that National Highways would be the ~~Overseeing~~overseeing Organisation. | Agreed |
| ~~3.11.44~~3.11.82 | Construction Access Design on National Highways | Further to Matter **ID ~~3.10.39~~3.11.68** (Construction Access and Crossover Design), it has been identified that bellmouth TB-B059 | Agreed | Agreed |

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| | Infrastructure | off the A120 Colchester Road east of Coggeshall (described in **Section 5.9** of the **Outline CTMP [~~APP-309~~REP3-028]**) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this access is proposed to be taken directly from the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location. | | |
| 3.11.83 | Proposed Highway Mitigation Design on Wick Lane | With regards to the safety concerns raised, we propose to install a set of 4-way traffic lights to manage construction traffic joining the public highway. This will be located;<br>1. On the haul road at the junction with Wick Lane,<br>2. On Wick Lane at the junction with the Haul road,<br>3. On Lodge Lane at the junction with Wick Lane, and<br>4. On Wick Lane at Ardleigh reservoir bridge.<br>The decision was taken to use a traffic management solution instead of widening the lane, due to the poor forward visibility and the additional vegetation removal and land take outside of the Essex CC ownership. Our assessment of the impact of the traffic lights on movements indicates that with a 96-second cycle time, predicted queues at either end are expected to remain below 5 PCUs (Passenger | As set out in ECC's Responses to ExQ1, comments on the Applicant's draft itinerary for the ASI & comments on any further information or submissions received by deadline 2 ([EP3-077] to date, ECC consider the safe use of Wick Lane by construction traffic has not been demonstrated. The position of the Highway Authority is that Wick Lane should not therefore be used by construction traffic. Due to the constraints in both width and alignment of Wick Lane this is not something that in the opinion of the Highway Authority can be deferred for further consider post DCO. | Under Discussion |

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| | | Car Units), indicating sufficient capacity for the proposed construction and existing flows. This is below the limits stated within the Traffic Signs Manual Chapter 8. National Grid has undertaken a Stage 1 Road Safety Audit (RSA) on the proposals. The Local Highway Authority (Essex CC) has reviewed the Stage 1 RSA and has responded that it is content that the proposals are safe.<br>We note Essex's concerns at this location. The Applicant's appointed Main Works Contractor is undertaking a more detailed assessment at this location. They will consider additional options as suggested by Essex County Council and will continue to engage with them on this matter. | | |
| ~~3.11.45~~3.11.84 | Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road | The widening scheme relating to Ardleigh Road referenced by Essex County Council is, as stated, intended to facilitate both construction and operational access to the proposed East Anglia Connection Node (EACN) Substation. The section of Ardleigh Road which would be impacted by the proposals is shown in **7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315], Sheet 15.**<br>The operational requirement for retaining the full proposed width of the carriageway is based on the need to maintain a route suitable for the Transformer Delivery Abnormal Indivisible Load (AIL) (as set out under **7.3 Outline Construction Traffic Management** | Details still outstanding – for example, ground conditions (existing construction of Bentley Road), and remote cycle way provision (maintenance issues),<br>Awaiting response following RSA, Designer's Response and ECC comments.<br>***Updated position February 2026:***<br>ECC require a commitment in the CTMP that a comprehensive investigation of the construction of Bentley Road will be undertaken by the Contractor to inform the subsequent detailed design for the works on Bentley Road. Our concern is whether there is sufficient depth of construction in the existing carriageway for the widening works to tie into, and that it can accommodate the volume of | Under Discussion |

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| | | **Plan - Appendix A - AIL Strategy [APP-310]**) in order to facilitate potential future delivery if a 'secured event' were to occur during the operational life of the proposed substation under the Natinal Electricity Transmission System Security and Quality of Supply Standard, as noted in paragraph 2.7.12 of **7.11 Transport Assessment [APP-333]**.<br><br>In developing the proposed access strategy, the Applicant considered a number of access options for the proposed EACN Substation. A summary of options is included within Table 3.19 of **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**.<br><br>The Applicant is aware of concerns expressed by Essex County Council with respect to the permanent operational arrangement of this widened section of Ardleigh Road. The Applicant will continue to engage with Essex County Council, and other relevant stakeholders, with a view to proposing suitable measures to address the noted operational concerns in this area. The option of increasing the permanent speed limit reduction along Ardleigh Road from 30 mph to 40 mph is being explored as a modification to the Development Consent Order application. Should residual risks be identified following this increase, the Applicant shall, through future engagement with the Local Highway Authority at detailed design, consider implementing permanent highway features to safely promote self-enforcement of the reduced speed limit, | construction traffic.<br><br>ECC's position is set out in the Deadline 3 submission at (p8 under Article 18) **[REP3-077]** in relation to maintenance issues where multiple NSIPs will be using and potentially maintaining the infrastructure installed on Bentley Road and Ardleigh Road. For clarity this is replicated below:<br><br>• ECC would like to see evidence that discussions have been happening with the other DCOs Applicants. ECC has previously highlighted this point as something that ECC is concerned with and would like to have reassurance that some form of collaborative agreement is in place between the windfarms and Norwich to Tilbury.<br><br>ECC's position in relation to ensuring ground condition surveys are undertaken for Bentley Road is that a commitment is required in the CTMP. Suggested text has been included as part of the response to the Inspector's Questions (Q1). For clarity this is replicated below:<br><br>• "Locations such as but not limited to Bentley Road, Ardleigh (Essex) that are proposed to be permanently provided will require a comprehensive investigation of the construction of the carriageway to inform the subsequent detailed design of the works."<br><br>Further discussions on Ardleigh Road are ongoing as concerns remain about the | |

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| | | whilst not impeding use of the access route by the necessary design vehicles.<br>~~National Grid have engaged with Essex County Council around the proposed Primary Access Route (PAR) on Bentley Road and Ardleigh Road, south and west of Little Bromley in Tendring. This route is shown as H17-A2 on the **Indicative Highway Mitigation Plans** within **Appendix C** of the **Outline CTMP** (**document reference 7.3**) **[APP-312 to APP-320 inclusive]**.~~<br>~~A mitigation scheme has been developed to facilitate the use of this route by the Project. This is detailed in **Section 5.8** of the **CTMP [APP-309]**, and includes four principal components:~~<br>~~Improvement of the A120(E) / Bentley Road junction, as discussed in Matter ID 3.10.43.~~<br>~~Widening of the existing carriageway along Bentley Road and Ardleigh Road, to be retained in the permanent case to accommodate National Grid's operational access requirements to the proposed Substation.~~<br>~~A permanent private access road between Bentley Road and Ardleigh Road, to be retained in the permanent case to accommodate National Grid's operational access requirements to the proposed Substation. This would not be adopted as part of the Public Highway.~~<br>~~A temporary facility for Non-Motorised Users separate to the carriageway along Bentley~~ | proposed design. | |

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| | | ~~Road and Ardleigh Road. The provision of this facility has been discussed with Essex County Council, and it has been agreed that it would be required in the temporary case only, and would be removed following the completion of construction activities.~~<br><br>~~Appropriate coordination of these arrangements with Essex County Council, National Highways, and other developers in accordance with **Section 6.6** of the **Outline CTMP (document reference 7.3) [APP-309]**. This proposed arrangement is considered suitable and sufficient for the proposed construction and operational access usage.~~The two existing Public Rights of Way (PRoWs) that cross the permanent private access road between Bentley Road and Ardleigh Road cross the access road at an angle. The intention is therefore for them to be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The sections of the PRoWs to be permanently stopped up, together with the proposed alignments of their associated diversions, are shown on the **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040 inclusive]**. As detailed design progresses, the precise alignment, length and specification of the permanent diversions and crossing will be developed in consultation with the Local Highway Authority PRoW Officer, and any resulting proposals would be in accordance | | |

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| | | with appropriate and relevant design standards. | | |
| **Abnormal Indivisible Load (AIL) Access** | | | | |
| ~~3.11.46~~3.11.85 | Abnormal Indivisible Load (AIL) Access Approach | The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within **Section 5** of the **Outline CTMP** (**document reference 7.3**) **[~~APP-309~~REP3-028]** and further detailed within the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP** (**document reference 7.3**) **[APP-310]**. A draft version of the AIL Access Strategy was shared with Essex County Council in March 2025.<br>This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.<br>National Grid held a Traffic and Transport Working Group Meeting following the closure of the targeted consultations. Updates were provided relating to engagement on AILS, PRoWS and highways modelling. | Principle of using designated routes on the local road network is agreed. However, details to be agreed. | Agreed |
| ~~3.11.47~~3.11.86 | Abnormal Indivisible Load (AIL) Access Routes | Routes proposed to be utilised by AILs are shown in the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP** (**document reference 7.3**) **[APP-310]**.<br>These have been developed following consultations with Essex County Council. As part of these consultations, draft route information was shared in July 2024 and April | Ongoing discussions with respect to ongoing structural investigations.<br>ECC provided initial comments during informal consultation period on dwg file provided in terms of tracking: H14-AIL1 wheel tracking appears to overrun edge of carriageway A120 RAB; H17 – AIL 1 wheel tracking overruns island on Pattricks Junction A120; confirmation | Under Discussion |

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| | | 2025.<br>National Grid will continue to engage with Essex County Council on the proposed AIL access routes, including with respect to the ongoing structural investigations. | on missing x ref<br>(x-OS TL8122)<br>Drawings showing AIL tracking as pdf version have been requested for ECC colleagues to review. | |
| 3.11.483.11.87 | Abnormal Indivisible Load (AIL) Access Routes | RoutesThe Applicant has engaged with National Highways on the proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP**) (**document reference 7.3**) **[APP-310]**. National Grid have been consulting with Essex County Council in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by Essex County Council in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP**) (**document reference 7.3**) **[APP-310]**.<br>routes, who have provided confirmation that the three structures listed have weight restrictions imposed, but they are above the anticipated weight of the Cable Drum AIL delivery vehicle (104 t), meaning Cable Drum and Large Mobile Crane AIL access is permitted. Therefore, the Applicant does not | Position from Local Impact Report:<br>EngagementThe AIL Strategy shows routes using the A12 strategic highway network and confirms National Grid are in discussions with respectNational Highways. ECC have not been party to impacted structures is anticipated to be ongoing in parallelthese discussions or with other stakeholders on the routes provided, save for the Development Consent Order processviews given based on discussions with Essex Police above. ItHowever, it is understood that any ApprovalsNational Highways have restrictions on the A12 in Principle secured at the current stage of project development do not remove requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out within **Section 6** of the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP**) (**document reference 7.3**) **[APP-310]**.<br>Colchester area at three locations – i) over the rail line north of A12, J27; ii) the bridge connecting the two roundabouts at the interchange of A12, J28; and iii) A120 slip road bridge over the A12. ECC is concerned that if the A12 cannot be used for the AILs then the | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | envisage running AIL routes through Colchester Town Centre. | Applicant may put forward a route through Colchester Town Centre. ECC would strongly oppose this route being used due to the level of disruption through the town and surrounding highway network.<br>This item is agreed on the basis of the applicant's confirmation that the National Highways structures do not cause issues for delivering Cable Drums and Large Mobile Cranes and there is not a proposal for using Colchester Town Centre. | |
| 3.11.88 | Abnormal Indivisible Load (AIL) Structural Investigations | ~~This approach~~The Contractor is currently undertaking detailed structural assessments along the selected AIL routes supported by their haulage specialist. This is dependent on the availability and adequacy of existing asset records. The Contractor is ~~considered~~aiming to ~~establish in principle that the proposed AIL deliveries required for~~complete this by the ~~Project are feasible, and that a suitable~~end of the Examination process, assuming all relevant information is ~~being undertaken in order to facilitate~~provided from the ~~anticipated formal AIL movement applications anticipated during construction of the Project~~asset owners in a timely manner.<br>However, this will only prove ~~The AIL applications submitted prior to vehicle movements made by~~ the ~~Main Works Contractor will address~~ structures ~~affected, street furniture~~are acceptable at the time of the assessment and identify any ~~third-party~~ | Ongoing discussions over feasibility with respect to structural investigations. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~land impacts as well as programming and operational arrangements~~mitigations required. A further review will be required closer to ~~accommodate~~the planned and agreed movement schedule to ensure the ~~movements with minimal impact on the network~~ALs are still suitable. | | |
| 3.11.89 | Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The locations of highway mitigations along proposed AIL Routes together with summary details for each location are set out within the **7.3 Outline Construction Traffic Management Plan - Appendix C - Guide to the Plans and Master Key Plan [APP-312]** and the **7.3 Outline Construction Traffic Management Plan – Appendix C - Indicative Highway Mitigation Plans - Sections A to H [APP-313 to APP-320].**<br>RSA1 audits have not been undertaken specifically for proposed AIL Routes in the preliminary design stage, and only undertaken on Primary Access Routes and at locations for site access points, crossing points or highway mitigation locations. Further development of the detailed design is to be undertaken, and some proposed AIL Route locations may be subject to associated stages of road safety audit. The detailed design proposals will require dialogue, approval/acceptance from the Local Highway Authority. | It is accepted that RSAs will occur for the AIL Routes for detailed design.<br>However, ECC believe further discussion is required to understand the implications if the proposed AIL route that is set out in the DCO is deemed unsuitable following detailed review. | Under Discussion |
| 3.11.90 | Abnormal Indivisible Load (AIL) Mitigation | Vehicle tracking swept-paths in preliminary design for A131 Beualieu Parkway at its roundabout with Loverose Way indicates | It is accepted that this is dealt with at Detailed Design Stage. However, we would like to discuss the constraints identified in the AIL | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | and Management Measures | minimal impact at this location, with possible overrun of the AIL vehicle body over outer grass verge areas. The development of detailed design stage would confirm whether any impacts are anticipated in this location, and as defined within DMRB GG119, a RSA may not be required if there are no physical changes to the existing highway infrastructure. Any requirements here will be subject to dialogue and approval from the LHA. | tracking provided to ECC. | |
| ~~3.11.49~~3.11.91 | Abnormal Indivisible Load (AIL) Mitigation and Management Measures | 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 the **7.3 Outline Construction Traffic Management Plan [REP3-028]**, signs are proposed on sections of the Major Road Network, Strategic Road Network and Primary Access Routes which may be subject to temporary traffic congestion and delay. The proposal to use Variable Messaging Sign (VMS) as part of this communication strategy is something the Applicant would welcome further discussion on with the relevant Local Highway Authorities.<br>~~The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the **Indicative Highway Mitigation Plans** within **Appendix C** of the **Outline CTMP (document reference 7.3) [APP-312 to APP-320 inclusive]**. These~~ | ~~Ongoing discussions.~~<br>~~Awaiting final drawings following RSA, Designer's Response and ECC comments.~~<br>~~Confirmation that all AIL mitigations are included in the RSAs undertaken. Proposals not included in the RSAs are to be confirmed to ensure they are exempt.~~<br>~~It is noted that works at A131 Beaulieu Parkway at roundabout with Loverose Way require an RSA.~~<br>Detail and discussion required regarding:<br>• VMS boards at key locations<br>~~Wider community engagement.~~<br>• ~~VMS and website.~~Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (**ID 3.10.41**), and are considered to be suitable and sufficient for the delivery of the Project.~~<br>~~Management measures relevant to AIL movements are discussed within **Section 5.9** of the **Outline CTMP (document reference 7.3) [APP-309]**, and **Section 6** of the **AIL Access Strategy** (**Appendix A** of the **Outline CTMP**) (**document reference 7.3**) **[APP-310]**. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.~~<br>~~In April 2025, National Grid held a further meeting to discuss the AIL process and report with ECC, Essex and Suffolk police.~~ As noted in Section 6.5 of **7.3 Outline Construction Traffic Management Plan [REP3-028]**, members of the community and local businesses will be kept informed regularly of the works through active community liaison. Section 3.3 of the **7.3 Outline Construction Traffic Management Plan [REP3-028]** 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 | | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | construction. The community relations team will maintain a Project website, which will act as a central source of information for the general public. | | |
| 3.11.92 | Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The indicative AIL movements set out in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** are to be reviewed and updated in the detailed design process undertaken by the Main Works Contractor(s). It is expected that the Main Works Contractor(s) will continue liaison with the Local Highway Authorities and key stakeholders on AIL management.<br>**7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** details that the Electronic Service Delivery for Abnormal Loads (ESDAL) system will be used to monitor and notifications be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible. As a general rule, to minimise disruption, AIL movements will be scheduled outside of peak traffic times, and in line with embargo times.<br>The cumulative impact associated with AIL assessment would be mitigated by the use of the ESDAL system to manage any impact on the operation of the network. AILs would operate outside of peak hours and have therefore not been assessed within the **7.11** | Agreed | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | **Transport Assessment [APP-333]**. The assessment within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** did not include AILs as these movements did not occur within the worst-case peak construction period identified within the trip generation.<br>The Applicant notes the concerns raised by Essex County Council. The Contractor will liaise with the Local Highway Authority and Essex Police to confirm the AIL delivery routes and escorting requirements. | | |
| 3.11.93 | Abnormal Indivisible Load (AIL) Mitigation and Management Measures | The Applicant acknowledges Essex County Council's summary of matters and will take it into account during forthcoming discussions with Essex County Council on recovering appropriate costs through a Planning Performance Agreement (PPA). | PPA costs to be agreed | Under Discussion |

## 3.12 Public Rights of Way (PRoW)

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **PRoW Assessment Chapter** | | | | |
| 3.12.1 | PRoW Separate Chapter | As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the **Environmental Statement (ES)**.<br>Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative **ES** chapter.<br>Note that an **Outline Public Rights of Way Management Plan [APP-329]** ~~(item **ID 3.11.3**)~~ has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project. | ~~No~~The Applicant's position is noted. No further comment | Agreed |
| 3.12.2 | Types of PRoW | ~~Types of PRoW intended to be considered as part of the Management Strategy were shared with Essex County Council within Section 2.1 of the PRoW Methodology Statement document in April 2025. This list is considered to suitable, and no additional PRoW types are required to be captured. The PRoW types intended to be considered are:~~<br>~~• Formally designated PRoWs (footways,~~ | ~~There should be a separation between routes with legal status and administered by ECC, and those that have not got legal status – i.e. Permissive Paths and Other Routes with public access. ECC have no influence over or interest in the routes with no legal status and are unable to make comment on them. The PROW MP does create the separation and so this table should reflect that as well.~~ | ~~Under Discussion~~Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | ~~bridleways, restricted byways, and byways open to all traffic)~~<br>~~• Permissive paths~~<br>~~• Open access land~~<br>~~• Cycle tracks, including the National Cycle Network~~<br>~~• Other routes with public access.~~<br>~~This is set out in **Section 1.4** of the **Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329].~~<br>~~**Updated Position (February 2026):**~~<br>The Applicant reviewed the presence of routes with and without legal status whilst preparing the **7.6 Outline ~~PRoW~~Public Rights of Way Management Plan [APP-329]** and impacts are identified separately for each type of Right of Way, thus distinguishing between their legal status. The review concluded that there were no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway. | ~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~Having reviewed the Applicants confirmation that there are no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway, ECC has no further comments and considers this matter can be moved to agreed. | |
| 3.12.3 | Proposed Management Regime Approach<br>~~The intended approach to management regimes to be considered as part of the Management~~ | The Applicant confirms that, should detailed design identify the need for any additional PRoW to be permanently stopped up, the Applicant will continue to engage with Essex County Council to consider appropriate mitigation in line with the principles set out in the **7.6 Outline ~~PRoW~~Public Rights of Way Management Plan [APP 329]** and the process for change detailed in its Section 7. | ~~No Very few permanent stopping up~~Further detail is required throughout several sections of ~~PROW has been identified at this stage. If~~the PMP specifically on speed limits, ~~at detailed design~~driver inductions, ~~it becomes apparent that further permanent stopping up is required, ECC~~signage and ~~National Grid will continue~~maintenance of temporary routes.<br>ECC considers amendments are required to be made to the PMP together with clear | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | ~~Strategy were shared with Essex County Council within Section 2.4 of the PRoW Methodology Statement document in April 2025. This established the following hierarchy of management measures:~~<br>~~• PRoWs to be kept upon existing alignments as a first preference, utilising management measures if required.~~<br>~~• Where maintaining existing PRoW alignments is not practicable, diversions along the shortest~~ | The Applicant confirms that where Public Rights of Way (PRoWs) are managed on their existing alignment, or diverted, public access will be maintained throughout construction in accordance with the **7.6 Outline Public Rights of Way Management Plan [APP_329].** However, the **7.6 Outline Public Rights of Way Management Plan [APP_329]** also notes that, at locations where PRoWs interact with haul roads or certain construction activities, temporary holding of PRoW users, or management of crossings, may be required to ensure safety.<br>Site specific management measures and any temporary diversions will be developed by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan. The final PRoW Management Plan will be submitted to, and approved by, the Local Planning Authority. | commitments incorporated that allow the LHA to ~~engage to understand how best to mitigate~~manage the PROW and customer engagement during the ~~effects, consistent with the principles of the~~ construction period.<br>ECC notes a revised PROW Management Plan~~. Additionally, and with reference~~ is to ~~discussions on~~be submitted by the ~~PROW Management Plan,~~ Applicant at Deadline 4 for review. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | ~~suitable route will be proposed.~~<br>~~• Where no suitable diversion routes are identified, PRoW closures will be considered as a last resort.~~<br>~~This is set out in **Section 3** of the **Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329].**~~<br>~~National Grid will continue to work with ECC, including if any permanent stopping up becomes apparent.~~<br>~~**Updated Position (February 2026):**~~ | | | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| 3.12.4 | Proposed Management Regime Approach | With regard to bridleways, the Applicant acknowledges discussions relating to appropriate widths where diversions are required. Following ~~engagement~~enagement with Local Highway Authority PRoW Officers, the **7.6 Outline ~~PRoW~~Public Rights of Way Management Plan [APP-329]** notes that bridleways which are constrained on both sides should be a minimum of 4 metres wide between fencing or other such constraint, to allow sufficient width for horses to turn around. | The provision of 4m wide routes where bridleways need to be diverted or fenced adjacent to ~~a~~ haul ~~road due to construction works it is noted there have~~roads has been ~~discussion around providing 4m wide routes because~~included in the ~~horses need space to turn due to spooking associated with the construction works.~~<br>PRoW Management Plan. ECC has no further comment and considers this issue can now be moved ~~As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time~~ to ~~respond,~~ agreed<br>ECC ~~reserves the opportunity to provide~~notes a ~~comprehensive response~~revised PRoW Management Plan is to ~~NGET's statement~~be submitted by the Applicant at Deadline 4 ~~of the Examination~~for review. | Agreed |
| 3.12.5 | Proposed Management Regime Approach | The Applicant notes this comment (4.5.86 to 4.5.88 of **the Local Impact Report [REP1-161]**) and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges. | ECC welcomes ongoing discussion with Applicant on the extent of mitigation required for PROW interaction with the adopted highway | Under Discussion |
| ~~3.12.4~~3.12.6 | Routes with Public Access Affected by the Proposed | Routes with public access affected by the proposed development are shown in the **Access, Rights of Way and Public Rights of Navigation Plans**. Details of proposed | They have published the plans now and ECC can see that the management measures are suitably identified on each PROW.<br>ECC notes a revised PRoW Management Plan | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | Development | management measures for each impacted route are shown in **Section 4** of the **Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329].** These are considered to be suitable, in line with the Proposed Management Regime Approach (**ID ~~3.11.3) set out above~~3.12.3**). | is to be submitted by the Applicant at Deadline 4 for review. | |
| ~~3.12.5~~3.12.7 | Reinstatement Approach | All PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with Essex County Council PRoW Officers as well as impacted landowner(s).<br>This is set out in **Section ~~3~~6** of the **Outline Public Rights of Way Management Plan (document reference 7.6) [APP-329].** | On the basis that all PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken, ECC has no further comment and is of the opinion this matter can be agreed.<br>~~No comment.~~ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review. | Agreed |

## 3.13 Cumulative Effects

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| **EIA – Regulatory, Planning Policy Context and Guidance** | | | | |
| 3.13.1 | Policy and legislation | The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [APP-126]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 ~~(~~- Cumulative Effects~~) of the ES~~ [APP-281]**.<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br>**~~Updated Position (February 2026):~~**<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).~~ Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**, in accordance with the agreed methodology in the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297],** including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on | ~~Awaiting confirmation pending sight of further information.~~ ECC would refer to its Relevant Representation submitted 27 November 2025 (RR-1083) and it's Local Impact Report (REP1-161)<br>~~ECC provided the following details in their relevant representations dated 27 November 2025:~~<br>~~•~~ It is noted that the Applicant has confirmed they will liaise with other developments (notably North Falls, Five Estuaries and Lower Thames Crossing) likely to be taking place at the same time as Norwich to Tilbury to reduce cumulative impacts. ~~Though,~~<br>ECC ~~would require~~requires the commitment form the Applicant to ~~go further~~ in ~~joining~~join and positively ~~engaging~~engage with a Developer's Forum to be set up by ECC with key members of the other NSIP Teams as well as other Strategic Site Teams, alongside Local Highway Authority and Planning Authority participation. ~~In addition, further~~<br>Further information on the detailed build programme will be required for the various stages of the construction through the Construction Management Plan which will be | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | landscape (construction), agriculture and soils (construction and operation) receptors because of the Project. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). | fed into from the Developer's Forum. ~~It is anticipated that all three approaches will assist in reducing the cumulative impact but there will still remain a legacy impact.~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ECC expects the Applicant to continue to proactively undertake reviews of the planning registers and engage with any emerging projects accordingly. | |
| **EIA – Approach and Methods** | | | | |
| 3.13.2 | Study area | The study area was agreed through the EIA **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |
| ~~3.13.3~~ | ~~Data sources~~ | ~~Sufficient desktop and survey data has been collected to inform the assessment as presented within **Sections 17.4** and **17.5** of **Chapter 17 (Cumulative Effects)** of the **ES [APP-281]**.~~<br>~~**Updated Position February 2026:**~~<br>~~National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)~~ | ~~No comments raised in the ECC relevant representations in relation to data around Cumulative Effects. It is noted further ongoing discussion is required on this matter.~~<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | ~~Under discussion~~ |
| 3.13.4 | Assessment | The methodology for assessing Cumulative | The methodology for assessing Cumulative | Agreed |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | methodology | Effects was agreed through the ~~EIA~~**6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | |
| 3.13.5 | Key parameters and assumptions | Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 ~~(~~-Cumulative Effects~~)~~ ~~of the ES~~ [APP-281]**. The key parameters and assumptions presented are considered appropriate.<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated Position February 2026:**~~<br>National Grid has provided a response to this matter at Deadline 1 through the relevant representations process ~~(document reference 8.4.1)~~**8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**. | Further information is required on a number of proposed aspects as set out in ECC's response to the targeted consultation and its Relevant Representation submitted 27 November 2025 (RR-1083). In particular, there are a number or access point and routes that are not currently supported.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | Under ~~discussion~~ Discussion |
| **EIA – Baseline Conditions** | | | | |
| 3.13.6 | Baseline conditions and receptors | The baseline conditions and receptors for Cumulative Effects are presented within the ~~environmental topic chapters (~~**Environmental Statement Chapters 6 ~~–~~to 16 ~~of the ES)~~[APP-138 to APP-280]**. The baseline conditions and receptors presented are considered appropriate. | This is the subject of on-going discussions. | Under ~~discussion~~ Discussion |
| **EIA – Embedded, Standard and Additional Mitigation Measures** | | | | |
| 3.13.7 | Embedded | The assessment of cumulative effects | ECC would refer to it's Relevant Representation | Under |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | mitigation | considers the residual effects identified during construction and operation (and maintenance) within ~~the environmental topic chapters (~~**Environmental Statement Chapters 6 ~~–~~to 16 ~~of the ES)~~[APP-138 to APP-280]**. Embedded mitigation measures, designed as an inherent part of the Project are therefore set out in ~~the environmental topic chapters of the ES~~Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated Position February 2026:**~~<br>National Grid provided a response to this matter at Deadline 1 through the relevant representations process ~~(document reference 8.4.1)~~8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. | dated 27 November 2025 Section 6.3 (RR-1083) and its Local Impact Report (REP1-161) part 4.4.. Further discussions are required on a range of issues to ensure necessary mitigation and compensation is agreed and secured appropriately.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | ~~discussion~~ Discussion |
| 3.13.8 | Standard mitigation | The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within ~~the environmental topic chapters (~~**Environmental Statement Chapters 6 ~~–~~to 16 ~~of the ES)~~[APP-138 to APP-280]**. Standard mitigation measures during construction are summarised in ~~the environmental topic chapters (~~Environmental Statement **Chapters 6 ~~–~~to 16 ~~of the ES)~~[APP-138 to APP-280]** and set out in ~~the~~**7.2 Outline ~~CoCP [APP-300~~Code of** | ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083) and its Local Impact Report (REP1-161) part 4.4.. Further discussions are required on a range of issues to ensure necessary mitigation and compensation is agreed and secured appropriately.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | Construction Practice [ REP3-025]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated Position (February 2026):**~~<br>National Grid provided a response to this matter at Deadline 1 through the relevant representations process ~~(document reference 8.4.1)~~ **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].** | | |
| 3.13.9 | Additional mitigation | The consideration of additional mitigation measures are presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 ~~(~~- Cumulative Effects~~)~~ ~~of the ES~~ [APP-281]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>~~ECC comments are noted, and NG will continue to engage with ECC on this matter.~~<br>~~**Updated Position (February 2026):**~~<br>National Grid provided a response to this matter at Deadline 1 through the relevant representations process ~~(document reference 8.4.1)~~**8.4.1 Applicant's Comments on Relevant Representations [REP2-023].** | ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 (RR-1083) and its Local Impact Report (REP1-161) part 4.4.. Further discussions are required on a range of issues to ensure necessary mitigation and compensation is agreed and secured appropriately.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | Under ~~discussion~~ Discussion |
| **EIA – Assessment Conclusions** | | | | |
| 3.13.10 | Construction effects | The assessment of effects during construction is presented in Section 17.4 and | ECC would refer to it's Relevant Representation dated 27 November 2025 Section 6.3 | Under ~~discussion~~ |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | 17.5 of **6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES [APP-281]**. The assessment of effects during construction presented is considered appropriate.<br>**Updated Position (February 2026):**<br>National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1)**8.4.1 Applicant's Comments on Relevant Representations [REP2-023].** | (RR-1083). and its Local Impact Report (REP1-161) part 4.4.<br>ECC has concerns regarding the effect of construction traffic on the County's highway network and cumulative noise and environmental impacts. .<br>ECC provided the following details in their relevant representations dated 27 November 2026:<br>• ECC is also concerned with the cumulative noise and environmental impacts arising from these developments. Taken together, especially in the Tendring area, but all along the route, the proposals have the potential to lead to significant adverse effects on communities and the environment. It is crucial that respite is offered to the communities affected by the development through reasonable working hours and construction traffic management. ECC is therefore seeking substantially better controls within the Development Consent Order and the Management Plans to ensure this respite is secured.<br>• In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages. | Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | A particular concern is in relation to the effect of construction traffic on the County's highway network. Minimal information is available concerning the development programme and timing for this project and how this relates to various other projects. It will be important for there to be coordination between ECC and all developers / key stakeholders for the effect on local communities to be minimised. This is addressed in more detail below within the 'Local Highway Impact' section~~.ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response~~. | |
| 3.13.11 | Operational (and maintenance) effects | The assessment of effects during operation (and maintenance) is presented in ~~Section~~Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 ~~(~~- Cumulative Effects~~)~~ ~~of the ES~~ [APP-281]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.<br>Further discussions will take place following additional information from ECC. | In the absence of information, it is difficult to confirm the acceptability of the effects during operation (and maintenance), but it is recognised on-going discussions seek to resolve these issues.<br>~~ECC is unable to respond to NGET's Updated position (February 2026) as the authority has not had sight of the National Grid's deadline 1 response.~~ | Under ~~discussion~~ Discussion |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.13.12 | Outline CoCP | ~~The~~**7.2 Outline ~~CoCP [APP-300~~Code of Construction Practice [ REP3-025]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 ~~(~~- Cumulative Effects~~)~~ ~~of the ES~~ [APP-281]** and is appropriate for managing construction | ECC ~~will be preparing~~provided a detailed ~~commentary in respect of the DCO and Management Plans in its~~section within it's Local Impact Report regarding Management Plans and will continue to review and provide commentary accordingly through submissions to the Examination on further revisions of | Under ~~discussion~~ Discussion |

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| | | impacts from the Project.<br>~~A meeting was held in October to agree on the structure for the **Outline CoCP [APP-300]**.~~<br>~~A meeting was held in March 2025 to discuss the second iteration of the **Outline CoCP [APP-300]**.~~<br>~~A further iteration of the **Outline CoCP [APP-300]** was issued in May 2025 following the meeting and feedback in writing.~~<br>~~**Updated Position (February 2026):**~~<br>~~Further discussions will take place following National Grid's review of ECC's LIR. National Grid will continue to engage with ECC on this matter.~~ | Management Plans submitted. | |
| **Other matters as required** | | | | |
| 3.13.13 | Cumulative Impacts | ~~**Updated Position (February 2026):**~~<br>The intra-cumulative assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** assessed the impacts on common receptors within the ES (Volume 6 of the DCO application) in accordance with the agreed methodology in the **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]**.<br>Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**, in accordance with the agreed methodology in the **6.19 Scoping Report** | ~~Relevant Representation received 27 November 2025:~~<br>• Cumulative impacts are clearly one of the key principle issues in the Examination. ECC is aware of a significant number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula and other NSIP schemes dependent on Norwich to Tilbury). Three NSIPs will already interact in concentrated ways in specific places in Essex, which could be exacerbated by a fourth NSIP. As set out across this response, the Norwich to Tilbury project is a catalyst and has the potential to give rise to intra-project cumulative effects in addition to | Under ~~discussion~~ Discussion |

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| | | **[APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**, including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors as a result of the Project.<br><br>The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025; however, since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of their respective development consent application. | the effects arising from other strategic development projects. The cumulative effect of these will need to be considered, especially with regard to highways, landscape and visual, noise, for example. The fourth NSIP, Tarchon Interconnector for which an application for Development Consent is expected to be submitted to the Planning Inspectorate in September 2027.<br><br>~~• As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | |

## 3.14 Development Consent Order

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

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the 3.1 Draft Development Consent Order [REP3-004].

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| 3.14.1 | DCO Requirements - Interpretation | The Applicant notes the Council's request for the definition of "reinstatement planting" to distinguish between replacement planting and what constitutes mitigation and compensation planting, but does not agree that there is any need for terms to be distinguished within the definition of reinstatement, as the definition already refers back to the Outline (or final) Landscape and Ecological Management Plan where necessary terms are explained. The definition mirrors the definition in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. | Requirement 1 - Interpretation<br>The definition of reinstatement planting needs to distinguish between replacement planting and what constitutes mitigation and compensation planting. | Not Agreed |
| 3.14.2 | DCO Requirements – Stages of authorised development | The Applicant has updated references to "days" to become references to "business days" throughout **3.1 Draft DCO [REP3-004]** .However, it is not appropriate to do a straight swap in all instances, hence some of the numbers have also been adjusted to provide a 'business day' equivalent period.<br>The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is no | Requirement 3 - Stages of authorised development<br>Paragraph 3(1) should refer to "seven business days" to ensure consistency across the dDCO.<br>ECC's view is that submissions under this article to the relevant planning authority should be for approval as opposed to notification given the scale of the project and potential for cumulative impacts arising from the project. ECC thus requests that paragraph 3(1) is amended and "for approval" is added at end of the text at 3(2). | Under Discussion |

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| | | requirement for the relevant authority to take any further action or other positive step(s) within that period. However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout **3.1 Draft DCO [REP3-004].**<br>The Applicant cannot accept submissions under Requirement 3(2) being for approval by the relevant planning authority. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030.<br>The Applicant does not consider it necessary to provide a timescale on prior notice under paragraph 3(a). The approach in **3.1 Draft DCO (Revision C) [REP3-004]** is consistent with that in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. | Paragraph 3(a) makes reference to "any revisions to the written scheme referred to in sub-paragraph (2) above must be submitted to the relevant planning authority in advance of the commencement of the stage of the authorised development to which the revisions relate" To avoid confusion and dispute, this paragraph should specify how far in advance this should be provided to the relevant planning authority to ensure they have due notice.<br>In respect of Paragraph 4 and the reference to 28 days, ECC requests the term 'days' is defined with Requirement 1. | |
| 3.14.3 | DCO Requirements – Construction environmental management plans | **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** are provided as appendices of **7.2 Outline Code of Construction Practice [REP3-025] ]** and includes all information that | ECC seeks an explanation from the Applicant why it has not submitted a Construction Environment Management Plan ("CEMP"). The B2T DCO requires such a plan. It is not clear that a Code of Construction Practice (which is proposed) will provide the same sorts of protections as a CEMP. If it is intended to do so, in particular because of various outline plans | Under Discussion |

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| | | would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required.<br>These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO (Revision C) [REP3-004]**.<br>The outline management plans have been developed in consultation with a range of stakeholders. Relevant Stakeholders will be engaged with on the development of the full detailed versions of management plans and as part of our ongoing engagement with stakeholders we will review if others wish to be listed as consultees within this requirement.<br>The Applicant notes the comment that additional consultees, such as the Local Highway Authority, should also be included in relation to the discharge of Requirement 4 (Construction management plans). The Applicant will consider whether this can be incorporated into the next revision of the Draft DCO to be submitted at Deadline 5.<br>Requirement 1(2) to the **3.1 Draft DCO (Revision C) [REP3-004]** provides that '*Where under any of the requirements the approval or agreement of the relevant planning authority or the relevant highway authority is required, that approval or agreement must be given in writing*.'<br>It is not necessary to specify that this provision refers to the approved outline management | appended to it, that should be made clear by the outline plans being listed. Furthermore, there are additional management plans which should be secured via this dDCO.<br>Reference is made to "Natural England" within Paragraph 4(1) – however there are many stakeholders who should also be engaged in consultation on these management plans which should be reflected within this requirement, including the Local Highway Authority for example and ECC awaits the outcome of the Applicant's review and sight of the DCO at Deadline 5.<br>At Paragraph 4(2), any agreement under this clause should be made in writing.<br>Paragraph 4(3) should refer to the approved outline management plans. As above any agreement should be made in writing. Furthermore, there should be a record of how amendments and updates will be captured and recorded to ensure transparency. | |

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| | | plans as these are certified documents under Schedule 19.<br>Appendix A of **1.3 Guide to the Application [REP1-001]** provides a master document list and revision history of all submission documents which are available on the Planning Inspectorate's website. Any documents submitted to discharge Requirements post-consent will be available on the relevant planning authority's website. | | |
| 3.14.4 | DCO Requirements – Design and layout plans (elevations) | The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft DCO [REP3-004]** . As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of **3.1 Draft DCO [REP3-004]** .<br>The Applicant notes the Council's comments regarding concerns with the limits of deviation, but reiterates that the limits of deviation have been assessed as part of the Environmental Statement and therefore restrictions to the limits of deviation are not necessary. | Requirement 6 – Design and layout plans (elevations)<br>ECC is concerned with the use of "general accordance" and the subjectivity that would be involved in the assessment of whether any materially new or materially different environmental effects from those identified in the environmental statement have occurred which informs "general accordance". No explicit consideration is given to how some areas may be more sensitive to departures than others.<br>The ES generally assumes the pylons as in the midline of the Limits of Deviation shown on the work plans. If a pylon is subsequently moved within those limits of deviation and closer to a receptor, but also higher, then there is likely to be a negative impact on said receptor experience of the development hence the concerns regarding the term "general accordance" and the desire to restrict the limits of deviation expressed.<br>ECC also considers that the host local planning | Under Discussion |

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| | | | authority should have a say in whether any changes from the design and layout plans give rise to any materially new or materially different environmental effects from those identified in the environmental statement. As such, the wording of paragraph 6(2) should be updated:<br>The authorised development will not be in substantial accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) in the opinion of the Local Planning Authority gives rise to any materially new or materially different effects…<br>ECC considers this could operate by way of a prior approval process similar to that in effect for many areas of the TCPA regime. | |
| 3.14.5 | DCO Requirements – Construction hours | The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.<br>The Applicant considers the provision for start-up and close-down activities 1 hour either side of the core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation<br>These activities do not typically involve the operation of heavy machinery, require HGV | The definition of "start up and close down activities" is noted in its relevance to Requirement 7. A query is raised as to the level of potential noise which could be generated by these activities which may cause a noise disturbance to local communities. For example, it is not clear what is meant by "low key maintenance" and what this could involve. | Under Discussion |

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| | | deliveries, or generate significant noise, dust, or vibration, and therefore are not nuisance generating activities. All activities taking place on-site remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in **7.2 Outline Code of Construction Practice[REP3-025]** .<br>In respect of noise impacts, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 – Part 1: Noise28, and as detailed in Section 14.4 of 6.14 Environmental Statement **Chapter 14 - Noise and Vibration [APP-256]**. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects as per commitment NV05 within Table 6.1 of **7.2 Outline Code of Construction Practice [REP3-025].** | | |
| 3.14.6 | DCO Requirements – Reinstatement schemes | The Applicant has updated the references in **3.1 Draft DCO [REP3-004]**to refer to "former condition" instead of "former use". The Applicant felt that the use of "and appearance of the land" in the Council's proposed defition of "former use" would satisfy the tests of | Requirement 10 – Reinstatement schemes<br>ECC notes the repeated reference to 'former use' within this part of the DCO and questions whether this should be defined to ensure that there is clarity around what is considered a 'former use' of a site. There needs to be clarity | Under Discussion |

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| | | precision and could potentially cause problems with compliance (for example if planting was required).<br>The presence of underground cables affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanked requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables. | around who determines what the former use of a site, alongside any enforcement actions around this. It is therefore suggested that 'former use' is defined as "the condition and appearance of the land prior to the commencement of the development"<br>Requirement 10(2) – ECC notes the exclusion from the reinstatement requirement of land within 10 metres of any underground cables. It would be helpful to clarify what will happen to this land. | |
| 3.14.7 | DCO Requirements – Decommissioning | Decommissioning has been scoped out of the Environmental Statement as per **6.20 Scoping Opinion [APP-297]** and the **3.1 Draft Development Consent Order (Revision C) [REP3-004]** reflects this (in that the definition of 'maintain' in Article 2(1) allows for the removal of part, but not all, of the authorised development). The Applicant's position normally in relation to promotion of Development Consent Orders is that decommissioning is not anticipated given the design life of the development and the | Requirement 13 – Decommissioning<br>ECC would welcome more detail around the decommissioning process, especially any impacts arising on communities and the local environment.<br>There is an expectation for restoration to contribute to sustainable land stewardship, climate change mitigation and adaptation, biodiversity and environmental net gain through the delivery of natural GI. If the restoration proposal is to return the site to arable land it will | Under Discussion |

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| | | continuing need for the transmission network to operate. However, all appropriate consents would be sought at the relevant time if decommissioning was in fact subsequently required in future.<br>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. | need to a better grade than before and demonstrate how it will deliver sustainable land stewardship with potential to link to Landscape recovery. | |
| ~~3.14.1~~3.14.8 | DCO Requirements – ~~timescales~~Applications made under requirements | ~~**Position provided February 2026:**~~<br>The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays.<br>The ~~processes and timescales for~~Applicant considers that this revised decision ~~making are~~period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the ~~project~~Project, which is of critical importance to the UK government's ~~Clean Power~~Net Zero Target of | The process and timeframes across the DCO must be sufficient for the relevant local authority to consider, undertake the necessary checks, engage with relevant stakeholders and respond to such applications submitted to it.<br>At Paragraph 1(1) LPA's are required to give notice of their decision on the discharge of requirements within 28 days. This is considered too short given the available resources and the processes involved in the discharge of Requirements, some of which will no doubt be complex and supported (properly) by a lot of detailed information. This period should be extended to at least 56 days. This is consistent with the statutory determination period for the discharge of conditions under the TCPA regime.<br>~~As ECC only had sight of NGET's" position February 2026" on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~In addition, at Paragraph 1(1)(b) where further information is required, the Clause should be altered from the day immediately | Under ~~discussion~~Discussion |

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| | | 2030, is not unnecessarily delayed by ~~circumstances~~means outside the control of National Grid.<br>The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.<br>~~There~~Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the ~~**draft**~~**3.1 Draft DCO ~~[APP-056~~(Revision C) [REP3-004]** to extend the ~~28~~25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question.<br>In any case, ~~National Grid~~the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure Essex County | following the date the information was supplied by the undertaker to the day after the receipt by the local planning authority of the further information. | |

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| | | Council, and other relevant host authorities, are able to respond on programme. | | |
| ~~3.14.2~~3.14.9 | DCO Requirements – ~~disapplication of legislation~~Further information | ~~**Position provided February 2026:**~~<br>~~ECC comments on the disapplication of The Hedgerow Regulations are noted.~~<br>Given the Project's status as a project of critical national importance, the Applicant considers five business days for the relevant discharging authority to request additional information to be proportionate and appropriate.<br>The Applicant has updated **3.1 Draft DCO [REP3-004]**to replace the five-day period for the request of further information to five 'business days' for consistency of terminology.<br>This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21-day period for notification of further information requested by a requirement consultee with an equivalent period of 15 'business days'.<br>Paragraph 2(4) of Schedule 4 to **3.1 Draft DCO [REP3-004]** allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary.<br>The Applicant expects to provide further information electronically, so the submission and receipt of the information is expected to | ~~The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC is reviewing the Hedgerows Regulations Report (APP-161) and will expand within the ECC Local Impact Report.~~<br>At Paragraph 2 (2), the timescale should be increased to at least seven business days consistent with that specified in the Bramford to Twinstead DCO.<br>At Paragraph 2 (3) the timescales for the local planning authority to issue the consultation following the receipt of information / additional information should be increased to ten business days. In addition, the backstop date by which the relevant authority must notify the undertaker should be increased to ten business days after the 21-day consultation period or the receipt of the Requirement Consultees response requesting the need for additional information. This is to reflect the pressure on resources of likely required consultees and to the relevant authority having to seek an extension.<br>The burden on LPA's could be further reduced if the Undertaker were to notify the Requirement Consultee directly at same time as LPA so ECC. suggests discussion with the Applicant as to how | Under ~~discussion~~Discussion |

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| | | occur at the same time in practical terms. It is therefore not anticipated that there is any merit in amending the drafting here.<br>The Applicant notes the point raised on notification of consultees and will consider whether this can be incorporated into the next revision of the Draft DCO to be submitted at Deadline 5.<br>~~National Grid awaits ECC's comments in the LIR.~~The Applicant considers that the existing drafting provides appropriate flexibility, but has been, and continues to be, committed to collaborative working with the relevant authorities and will continue to engage on these matters throughout Examination and post consent should development consent be granted. | that could work.<br>ECC is concerned about the process where the supplied information is not acceptable. While Schedule 4 paragraphs 2 and 3 deals with some aspects of that, it does not address circumstances where ECC only knows what further information is required once it has received comments from consultees. and does not address the issue. It is therefore suggested that:<br>• In Schedule 4 Paragraph 2, replace," the relevant authority must, within 5 days of receipt of the application" with "the relevant authority must, within 21 days of receipt of the application;<br>• ~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~In Schedule 4 Paragraph 3 delete "and in any event within 21 days of the receipt of the application" is deleted from Paragraph 3 of this Schedule. | |
| ~~3.14.3~~ | ~~DCO Requirements – protective provisions~~ | ~~**Position provided February 2026:**~~<br>~~ECC comments on the protective provisions are noted, and National Grid will continue to engage with ECC on this matter.~~ | ~~As highway authority, ECC welcomes draft Protective Provisions but these need to be the subject of further discussion between ECC and the Applicant to ensure appropriate mitigations.~~<br>~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive~~ | ~~Under discussion~~ |

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| | | | ~~response to NGET's statement at Deadline 4 of the Examination~~ | |
| ~~3.14.4~~3.14.10 | DCO Requirements - ~~draft Requirements~~Fees | ~~**Position provided February 2026:**~~<br>The Applicant has updated the proposed fee to align with the current national guidance in **3.1 Draft DCO [REP3-004]**.<br>In line with the approach taken on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, and the proposed entry into post-consent Planning Performance Agreements, the Applicant does not consider it necessary for refunds of application fees to be subject to any retention.<br>~~ECC comments on the draft Requirements are noted, and National Grid will continue to engage with ECC on this matter.~~The Applicant does not consider it appropriate to index link the application fee. Application fees for recently made development consent orders do not require indexation (see, for example, the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. | ~~The draft Requirements require further discussion both in terms of their scope, and current detail. This includes in relation to construction hours, piling and potential noisy works. ECC will be seeking to ensure communities have appropriate periods of respite from noisy and invasive construction activities.~~<br>ECC is giving further consideration to what the specified fee at part 3(b) should be and its relationship to prescribed fees and any post consent PPA and will update the Applicant and the ExA as soon as practicable.<br>The period within which the application has to be determined should be increased to 42 days, as should the period for the refund This more realistically reflects the processing time which will be needed to carry out the necessary consultation key consultees and for them to consider the submitted information which on a project of this scale will no doubt be extensive and detailed. This situation is further exacerbated by the number of DCO's may LPA's are currently having to process.<br>Any refund of application fee should be subject to a 20% retention to cover the initial administration costs of processing the submission.<br>~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the~~ | Under ~~discussion~~Discussion |

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| | | | ~~opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~The dDCO should clarify whether the fees will be index linked. | |
| ~~3.14.5~~3.14.11 | DCO Requirements – ~~certified~~Certified documents ~~and management plans~~ | ~~**Position provided February 2026:**~~<br>The **7.2 Outline Code of Construction Practice [~~APP-300~~REP3-025]** secures a number of measures that would robustly control the construction and operation of the Project in terms of works to watercourses, land drainage, surface water drainage and pollution risks. It is therefore not considered necessary that the **7.9 Flood Risk Assessment [APP-331]** becomes a certified document, however, ~~National Grid~~the Applicant will continue to engage with ECC on this matter. | The Lead Local Flood Authority ("LLFA") is concerned that the dDCO, Draft Schedule of Requirements and Explanatory Memorandum do not highlight the existing flood risk, the need for managing said risk and/or the presence of overland flows. This issue is relevant for both pre and post construction. ECC suggests that the Flood Risk Assessment and the Surface Water Management Principles document be listed as 'CERTIFIED DOCUMENTS' of the DCO and that the Construction Environmental Management Plan is drafted to control works that affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants.<br>~~As ECC only had sight of NGET's position (2026) on 20 February 2026, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | Under ~~discussion~~Discussion |
| ~~3.14.6~~3.14.12 | DCO Requirements – ~~register of Requirements~~Additional requirements | ~~**Position provided February 2026:**~~<br>The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State. At present, there are no Requirements proposed to be discharged by the Secretary of State. | Given the scale and complexity of the project across multiple areas, ECC would encourage that the DCO requires the Applicant to maintain a 'Register of Requirements' ~~such as that seen in the Lower Thames Crossing Development Consent Order~~ to ensure ongoing fairness, public confidence and transparency. Additionally, to ensure the timeliness and efficiency of the | Under Discussion~~discussion~~ |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Each authority should maintain a register of DCO Requirement discharge applications, as it would planning condition discharge applications and, therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.<br>~~National Grid will continue to engage with ECC on this matter.~~ | discharge of requirements process this should include all relevant certified plans and documents that will be required to undertake the assessment of the submitted requirement material.<br>~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | |
| 3.14.13 | DCO Requirements – Additional requirements | The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by the Applicant to the local planning authorities along the Project route under s.106 of the Town and Country Planning Act 1990, relating to obligations designed to secure at least a 10% biodiversity net gain as part of the Project. As the Applicant intends to secure the BNG commitment via a unilateral undertaking, it is not considered a further commitment within **3.1 Draft DCO [REP3-004]**is necessary. | A post-consent programme of ecological mitigation measures and a BNG delivery plan will both need to be secured through the dDCO Requirements. | Under Discussion |
| 3.14.14 | DCO Requirements – Additional requirements | The Applicant notes the concern about the cumulative effects of the project with other NSIPs and other major infrastructure projects and will consider the request for a Developer's Forum and continue to engage with the local authorities accordingly. | To manage the cumulative impacts arising from this scheme, ECC is seeking the establishment of a Developers Forum. This should be in place to monitor and manage the impacts arising from this and other nationally and strategic developments in Essex. ECC would wish to see further commitments from the Applicant on this matter. | Under Discussion |
| 3.14.15 | DCO | The Applicant has prepared **7.3 Outline** | There is a need for surveys to be carried out and | Under |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | Requirements – Additional requirements | **Construction Traffic Management Plan [REP3-028]** which includes details of proposed management and mitigation measures associated with construction traffic, including Heavy Goods Vehicle (HGV) drivers not adhering to the agreed routes or HGVs drivers parking or waiting on the highway in inappropriate locations. With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to engage with the local authorities on this matter. | mitigation agreed before the commencement of works for HGV parking. ECC recommends that this is either captured within an appropriate management plan, or through an additional requirement and would welcome discussions with the Applicant on this matter accordingly. | Discussion |
| 3.14.16 | DCO Requirements – Additional requirements | As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074] ,**the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will continue to engage with host authorities to inform the content of the Employment and Skills Plan.<br>The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement in an update to **3.1 Draft DCO [REP3-004]**when the Employment and Skills | ECC welcomes a requirement in the DCO which requires an Employment, Education, Skills and Supply Chain strategy to be submitted. ECC would recommend this is submitted to the relevant local authorities approval prior to commencement of construction as a mechanism to secure legacy benefits from the development. ECC would welcome further engagement with the Applicant on the detail within this strategy. | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Plan is submitted at Deadline 5. | | |
| 3.14.17 | | Mitigation measures for health and wellbeing will be secured via Requirement 7 (management plans) of **3.1 Draft DCO [REP3-004]**, and there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. | The dDCO should include a standalone Health and Wellbeing mitigation strategy and a health and wellbeing monitoring plan. | Under Discussion |
| 3.14.18 | DCO Requirements – Additional requirements | The Applicant supports the delivery of Environmental Net Gain including Green Infrastructure and will consider whether there are any opportunities to deliver under enhancement.<br>In relation to the addition of a requirement to monitor and report on BNG and Green Infrastructure delivery, **7.1 Biodiversity Net Gain Report [APP-299]** includes a commitment to undertake monitoring for a period of 30 years with details to be set out in a habitat management and monitoring plan. **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**also provides for monitoring. | ECC recommends an additional requirement regarding a Green Infrastructure (GI) Strategy to address the alignment between measures set out in the OLEMP (APP-321) and BNG Report (APP-299).<br>Additionally, the Environment Statement recommend other ecological enhancements not captured by the metric, such as bird and bat boxes and habitat piles. These enhancement and mitigation measure identified are instrumental in contributing to producing quality GI therefore all these GI threads should be carried through to detail stages of the application and secured through a suitably worded Requirement. | Under Discussion |
| ~~3.14.7~~3.14.19 | DCO Requirements – ~~submissions~~Submissions for discharge of ~~Requirements~~req | ~~**Position provided February 2026:**~~<br>Those Requirements that require the submission of substantive documents specify the required content of these documents. In particular, any submissions under Requirement 4 must be in substantial accordance with the | The content and quality of any submission for the discharge of requirements must be to an agreed standard to support efficient processing.<br>~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the~~ | Under ~~discussion~~Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | uirements | relevant outline management plan, which ensures that the relevant authorities are aware of the nature of the submission they will receive and which will support effective and efficient processing.<br>~~National Grid will continue to engage with ECC on this matter.~~ | ~~opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | |
| ~~3.14.8~~ | ~~DCO Wording – definitions and terminology~~ | ~~**Position provided February 2026:**~~<br>~~ECC comments on the consistency of terminology in the draft DCO are noted, and NG will review and consider these points in the next revision of the draft DCO.~~ | ~~For consistency within the DCO, there are a number of definitions and drafting points to be addressed (such as the use of 'business day,' 'working day' and 'day' interchangeably; and 'discharging authority' and 'relevant authority'). The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it.~~<br>~~As ECC only had sight of NGET's position (2026) on 20 February 2026, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | ~~Under discussion~~ |
| ~~3.14.9~~ | ~~DCO Wording – authorised development and LoD~~ | ~~**Position provided February 2026:**~~<br>~~The authorised development and associated development are described in Schedule 1 to the **draft DCO** (APP-056). The authorised development is further shown on the Works Plans.~~<br>~~In addition, the Applicant submitted a **Details of Associated Development with references to documents** report (APP-121) with its application, which delineates the authorised~~ | ~~In respect of Article 3, clarity is needed that the development consent is provided for the authorised development "to be carried out within the Order limits" (as defined in the dDCO), so that the scope and limits of the development consent can be clearly set out, in order to reflect the development subject to the examination.~~<br>~~Further clarity is needed around the limits of deviation and authorised development so that the scope of the development consent can be~~ | ~~Under discussion~~ |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~development and the associated development. The limits of deviation are set out in Article 5 (limits of deviation) to the draft DCO are shown on the **Works Plans** (APP-017 to APP-024) and in the table of parameters at the back of the Works Plans for each section.~~<br>~~National Grid will continue to engage with ECC on this matter.~~ | ~~clearly set out, in order to reflect the development subject to the examination. As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination~~ | |
| **Other matters as required** | | | | |

## 3.15 Other Matters

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

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| 3.15.1 | Dunton Hills Garden Village Viability | ~~**Updated Position (February 2026):**~~<br>~~National Grid~~The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. ~~National Grid consider~~The Applicant considers it possible for the overhead line to co-exist with the housing proposals and have sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection | ECC reserves its final position subject to the outcome of the Savills report into the impact of the proposal on the viability of the proposed development and the ability to support necessary affordable housing and infrastructure to support the creation of a sustainable community. ECC would reiterate its concern regarding the lack of any baseline assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely significant effects from those impacts to the principles of the | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design.<br>National Grid also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. National Grid continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the National Grid's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites.<br>The Applicant can confirm that notwithstanding the statements in the LIRs, that the Project has considered DHGV during routeing and refinement of the alignment. 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.<br>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.<br>~~National Grid will continue to engage with ECC~~ | Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.<br>ECC refers to ~~it's~~its Relevant Representation submission (27 November 2025) paragraphs 6.2.16-6.2.21) (RR-1083). ECC commissioned Savills to investigate the impact of the pylons and overhead power lines on the planned viability and deliverability of the garden village development at Dunton Hills and specifically, the impacts of the N2T proposals on property prices and the Residential Gross Development Value (RGDV) of the proposed Dunton Hills Garden Village (DHGV) scheme.<br>The report concludes that the introduction of overhead pylons is likely to have a material impact on residual land value with a reduction in the order of £17.5m to a policy compliant scheme.<br>ECC will therefore be continuing to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the viability and deliverability of both, DHGV and emerging development proposals in Basildon Borough directly to the east<br>Continued engagement and discussion would be welcomed.<br>~~As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of~~ | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | ~~on this matter.~~ The Applicant does not consider that the Project will result in any significant impact with regard to the viability of DHGV. The Applicant's position is that deliverability of DHGV is not prejudiced by the Project. | ~~the Examination~~ | |
| 3.15.2 | Climate Change | ECC comments are noted, and National Grid will continue to engage with ECC on this matter. | Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation. | Under ~~discussion~~ Discussion |
| 3.15.3 | Green Infrastructure / BNG | ~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter.~~For The Applicant's position on Biodiversity Net Gain, please refer to Section 3.13 'Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** | ECC places significant importance on protecting and enhancing green infrastructure, accessibility, and biodiversity net gain. There is no objections in principle to the relocation, alignment of pylons in several of the sections, where it reduces the removal of trees and reduce the impact on mature woodlands but ECC supports a strategy that seeks to maximise opportunity to reduce environmental impacts and for habitat retention, enhancement, and creation through the delivery of Green Infrastructure to meet the biodiversity net gain requirements and align with the Essex Local Nature Recovery Strategy objectives. Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation.<br>ECC recommends that landscape and BNG plans for Norwich to Tilbury NSIP be aligned with other regional projects (e.g. North Falls and Five Estuaries offshore wind farms) where the project crosses over such as ECAN, to support coherent habitat creation, reduce fragmentation, and strengthen GI and nature | Under ~~discussion~~ Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | recovery delivery across the wider landscape.<br>ECC requests detailed mapping showing how the project supports LNRS priorities and a robust monitoring framework to ensure delivery of GI benefits over time. | |
| 3.15.4 | Removal of Obsolete Pylons | ~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter~~The Applicant welcomes ECC's support for the removal of existing lines and acknowledges the Council's encouragement to explore further opportunities to reduce cumulative visual impact of energy infrastructure. | ECC welcomes the proposal to remove a number of 132kV pylon lines operated by UK Power Networks and would encourage National Grid to continue to explore opportunities for N2T to facilitate the removal of further 132kV pylon lines operated by UK Power Networks, to reduce the cumulative visual impact of energy infrastructure, and compensate for the additional LSE to landscape and amenity of the proposed new 400kV power lines | Under ~~discussion~~ Discussion |
| 3.15.5 | Airfields | ~~ECC comments are noted, and National Grid will continue to engage with ECC on this matter~~For The Applicant's position on Airfields, please refer to Section 3.17 'Safety and Security – Airfields in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. | ECC reserves its position on this issue pending the outcome of these discussions and confirmation regarding the impact on the future use of airfield across the country as highlighted in the response to the targeted consultation. | Under ~~discussion~~ Discussion |

# 4. Appendices

## 4.1 Appendix A Draft DCO working

Please note that the following table captures matters regarding the draft DCO between the Applicant and Essex County Council. In addition, Basildon Borough Council, Tendring District Council and Colchester City Council have deferred their position on the draft DCO to ECC.

Table 4 Essex County Council – Comments on the draft DCO

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| 1 | DCO Wording – Highways | The Applicant shared draft protective provisions with the highways authorities in July 2025 and sought comments on this draft. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the highways authorities. The Applicant has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicant's understanding that the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective | ECC have confirmed their desire to enter into a Framework Highways Agreement or similar side agreement with the Applicant both verbally and in writing when responding to informal comments on the Protected Provisions. ECC have not received any confirmation from the Applicant and so have included this point in the Local Impact Report.<br>ECC would welcome further engagement on this point to provide a level of surety for ECC ahead of the close of the examination. This is of importance as ECC are not satisfied with the level of detail included in the Protected Provisions. As the LHA, ECC would expect (and indeed the public and County Council members would expect) a level of oversight and management of the local highway network. ECC believe the Framework Highways Agreement has | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | Provisions to reflect Essex County Council's comments) to all the highways authorities and we await comments. | worked well on Bramford to Twinstead, providing sufficient oversight, and collaboration between the local highway authority and the developer. From experience at the implementation stage, contractors welcome the 'business as usual' approach which is our standard practice rather than bespoke arrangements that neither the LHA or the contractor are familiar with. | |
| 2 | DCO Wording - Terminology | The use of "business days" rather than "calendar days" across the draft Development Consent Order is consistent with made development consent orders but the Applicant has considered the point and made appropriate amendments in 3.1 Draft Development Consent Order [Revision C] submitted at Deadline 3.<br>However, with the exception of Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders, the Applicant has updated the 3.1 Draft Development Consent Order [Revision C] to consistently use 'business day' timescales, to remove reference to 'discharging authority' and to update the definition of 'relevant authority'.<br>The Applicant notes the Council's comments on the consistency of terminology and timings in relation to the Permit Scheme and TROs and is considering these points.<br>The Environmental Permitting (England and Wales) Regulations 2016 is already included in Article 2 (Interpretation) as "the 2016 Regulations". The Energy Act 2004 is not referred to in the draft Development Consent Order and therefore does not need to be included in this article.<br>The operations comprised in the definition of | Part 1 Preliminary<br>Article 2 – Interpretation<br>For consistency within the DCO, there are a number of definitions and drafting points to be addressed (such as the use of 'business day,' 'working day' and 'day' interchangeably; and 'discharging authority' and 'relevant authority'). ECC proposes that all periods of seven days or less be specified to be business days.<br>The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it.<br>It is further queried whether the Environmental Permitting (England and Wales) Regulations 2016 and the Energy Act 2004 should also be mentioned in this section. They are relevant to the dDCO "Pre-commencement operations".<br>There are concerns with the definition of | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | pre-commencement operations are either de minimis or have minimal potential for adverse impacts, and by virtue of Requirement 4 of the Order, must be carried out in accordance with the outline management plans. Indeed, they may, in some cases, need to be carried out in order to comply with pre-commencement requirements (for example, to inform assessments and proposals required to be submitted for approval) or to implement environmental mitigation or other measures required pursuant to European Protected Species licences.<br>As noted in the **3.2 Explanatory Memorandum [Revision C],** the additional items contained in the definition of 'pre-commencement operations' beyond those in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are:<br>• Listed building surveys – these have been included at the request of Essex County Council;<br>• Protection works comprising utilities protection works or fencing and protection slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.<br>• Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary laydown areas in addition to construction compounds. | pre-commencement operations in respect of works 'excluded from the commencement of development' and associated with the establishment of construction compounds. These operations are extensive and include temporary laydown areas and compounds and the creation of bell mouths all of which could necessitate the potential removal of trees and hedgerows in advance of any Requirement for a Vegetation Retention and Removal Plan being discharged.<br>This is also of specific concern in respect of historic buildings where it is noted that specified pre-commencement operations could proceed without triggering necessary mitigation likely to be set out in the Requirements.<br>While the submitted ES assumes that the excluded works and operations would be unlikely to have any significant environmental effects, ECC is of the opinion the effects of some of these works could have major impacts locally that need mitigating, or which could cumulatively give rise to significant effects needing mitigation.<br>As a result, these works have the potential to be so significant as to give rise to materially new/different environmental effects which ought properly to be subject to further checks before being allowed to proceed. In light of this, ideally many operations (such as the establishment of construction compounds), should be excluded from the definition of pre-commencement operations. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | National Grid does not consider its inclusion to be materially beyond the scope already set out.<br>• Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put the Applicant in a favourable position to deliver the Project by the target date.<br>There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.<br>The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement. The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the Applicant considers that the exclusion of these works and operations from the definition is appropriate.<br>The Applicant does not consider it necessary or appropriate to include the Council's proposed tailpiece, since any failure to comply with a term of the DCO by the Applicant would be an offence. Furthermore, | If this is not acceptable, a compromise could be the addition of a tailpiece:<br>'those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority'<br>Pre-commencement surveys of listed buildings should be included in the list of pre commencement operations, as they have the potential to be impacted by vibration once the development commences. | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | recently made DCOs do not include such a tailpiece. | | |
| 3 | DCO Wording - Maintain | In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network. | "Maintain"<br>The definition of "maintain" includes a wide range of specified operations in relation to the authorised development, providing that as long as such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, these specified operations can take place without further consent.<br>To provide clarity and avoid any dispute, the DCO should incorporate a mechanism for assessing and determining whether such maintenance works give rise to materially new/different environmental effects. As a result, the definition of<br>'maintain' be amended to include "provided such works do not in the opinion of the local planning authority give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of "maintain" must be construed accordingly." | Under Discussion |
| 4 | DCO Wording – Outline Management Plans | **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** are provided as appendices **of 7.2 Outline Code of Construction Practice [Revision B]**. The Outline Code of Construction Practice includes all information that | Omission of outline management plans<br>The dDCO omits reference to outline management plans which were included in the B2T DCO, namely: an Outline Construction Environmental Management Plan.<br>It also omits reference to an outline Noise and Vibration Management Plan (APP-306), | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | would typically be found within a Construction Environmental Management Plan (CEMP); therefore a separate CEMP would not be required.<br>These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft Development Consent Order [APP-056].**<br>The term "Noise and Vibration Management Plan" is not used in the draft Development Consent Order, which is why it does not have a separate definition, however, the outline management plan is, as the Council has recognised, an appendix to the Code of Construction Practice and hence is controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order.<br>As per the Noise and Vibration Management Plan, without express use of the named management plans, there is no purpose in providing definitions. | and an outline Dust Management Plan (APP-304), both of which are envisaged in the Applicant's Environmental Statement (as appendices to the Code of Construction Practice, but worthy of separate definition in ECC's view, as these are seen as being absolutely necessary to protect enjoyed residential amenity).<br>The need for these plans is addressed further in the section concerning the Requirements. Any other outline management plans should also be defined in Article 2. | |
| 5 | DCO Wording - Interpretation | This term is already defined in Article 2 (Interpretation) of the draft Development Consent Order in the same way as it is defined in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. | "Provisional Advance Authorisation"<br>A definition of "provisional advance authorisation" (as per Reg 2 Traffic Management Permit Scheme Regs 2007) should be included in the dDCO to ensure consistency with other DCO, including the Bramford to Twinstead project. | Agreed. |
| 6 | DCO Wording – Development Consent etc. granted by the Order | In relation to the comment on Article 3(1), Article 3(8) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the **2.3 Works Plans [APP-017 – APP-024],** subject to article 5 (limits of deviation) and to the Requirements. The Applicant does not consider any further clarification is required.<br>Paragraph (7) specifies that the development consent granted by the Order allows works (including demolition | Part 2 Principal Powers<br>Article 3. Development consent etc. granted by the Order<br>While Article 3(1) confirms that, subject to the provisions of the Order (including the Requirements) National Grid is granted development consent, the extent of the consented development should be clarified by the addition of "to be carried out within | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | of buildings or other structures) within the Order limits to the extent that they are required by or incidental to the carrying out of the authorised development, as permitted by section 120(3) of the Act. There is precedent for this in the North Killingholme (Generating Station) Order 2014. Although this provision was removed from the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the scope of the power is not inconsistent with the works authorised in Schedule 1 (authorised development) and is clearly stated to apply for the purposes of the authorised development only. These precedents do not include a mechanism for assessing and addressing any materially new or materially different environmental effects and National Grid considers it appropriate to include this provision in this Order, without amendment, taking into consideration the scale and urgency of the Project. | the Order limits" (as defined in the dDCO). This is so that the scope and limits of the development consent are clearly set out and reflect the development subject to the examination.<br>Article 3(6) provides for the authorised development to include and permit the alteration, removal, clearance, refurbishment, reconstruction, decommissioning and demolition of any other building or other structure within the Order limits, to the extent that they relate to, are required by or are incidental to the carrying out of the authorised development. As this is not limited to the authorised development described in Schedule 1 (and "authorised development" is defined more broadly than that in Article 2), the dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from the development authorised in Article 3(6). | |
| 7 | DCO Wording - Maintenance | In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network.<br>The request for an obligation on the Applicant to decommission part of the authorised development should it become obsolete is not necessary. As a transmission licence holder, the Applicant has statutory | Article 4 4. Maintenance of authorised development<br>As raised within Part 1 Preliminary, Article 2 – Interpretation, the scope of works permitted to maintain the authorised development is broad. The dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the | Under Discussion |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. | Environmental Statement arising from such works.<br>In addition, under this Article, there should be an 'in principle' obligation on the Undertaker to decommission (part of) the authorised works as and when they become obsolete due to improvements in technology or otherwise. | |
| 8 | DCO Wording – Limits of Deviation | The term 'lines and situations' is a commonly used and understood term in development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant does not consider that this term needs to be defined.<br>The Applicant has addressed the Council's concerns on limits of deviation relating to sensitive receptors in the Historic Environment section in Chapter 4 of this document and so we do not repeat that here.<br>The Applicant has provided its justification for a six metre upwards limit of deviation earlier in this document and does not repeat it here.<br>In respect of the downwards limits of deviation, the Applicant considers there to be sufficient controls included in the outline management plans. The proposed drafting mirrors the drafting contained in Article 5 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024. | Article 5. Limits of Deviation (LoD).<br>ECC considers that the LoD potentially have significant implications for how the development is experienced and in terms of its relationship to a variety of receptors.<br>Firstly, at Article 5(1)(a) the term 'lines or situations' should be defined and added to list of definitions as the language lacks the clarity required given the importance and potential significance of this element of the DCO.<br>The Limits of Deviation (LoD) allow for longitudinal and lateral deviation within the limits shown on the Work Plans, as well as vertical deviation.<br>ECC notes that Article 5(1)(b)(i) would permit a vertical limit of deviation of 6 metres for the majority of the pylons. The Explanatory Memorandum (APP-057) explains that the rationale for the 6m limit is intended to provide a necessary but proportionate degree of flexibility. While noted, ECC is of the opinion this is a considerable extent of deviation, which as proposed, is not suitable for particularly | Under Discussion |

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| | | | sensitive areas such as nearby residential properties, in or nearby protected landscapes and nearby Grade 1 listed buildings, where the potential impact would potentially be greater than in other areas.<br>The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project.<br>[…]<br>These properties are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation.<br>It is therefore proposed that the limit vertical deviation should be no more than 4 metres, (as per Bramford to Twinstead DCO, which is a more local, and thus more relevant development than the Yorkshire Green | |

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| | | | Energy Project, to which the Applicant refers in the Explanatory Memorandum). Anything beyond this 4 meters should require prior approval from the relevant planning authority.<br>At Article 5 (1)(d)(ii), the draft Order would also allow underground cables to be moved downwards to such extent as the undertaker considers necessary or convenient. While this may be acceptable in certain locations, other locations may be more sensitive due to ground conditions, water tables, archaeology or the cumulative effects of other structures being constructed. In certain defined locations (which should be discussed and agreed with the district authorities) therefore; the limit of deviation downwards should be restricted unless otherwise agreed by the local planning authority. This concern also extends to downward deviation permitted under Article 5 (3)(b).<br>The proposed level of deviation within Article 5(3)(a) allows permanent above ground structures, erections and apparatus forming part of the authorised development, including substations, converter stations and cable sealing end compounds to be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans. This is not appropriate in designated sensitive areas, where this provision needs to be reduced. These sensitive areas must | |

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| | | | be discussed and agreed between the Applicant and all relevant authorities. In this regard, it is suggested for those designated locations, a lower level of deviation is agreed or a process of prior approval with the relevant local planning authority is introduced.<br>In addition, it is assumed that the level of deviation proposed is consistent with the principles of the Rochdale Envelope which involves defining a set of parameters (e.g., maximum building height, footprint, etc.) within which a development can vary. In any event, confirmation is requested that the impacts and worst-case scenarios arising from the limits of deviation are fully assessed in the Environment Statement. | |
| 9 | DCO Wording – Street Works | National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of | Part 3 Streets<br>Article 11. Street Works<br>Article 11(3) would enable envisaged works in the highway to proceed without express consent from the Street Authority if a decision is not provided within 28 days. ECC agrees with the approach, but not with the timescale. The Bramford to Twinstead DCO included a timescale of 35 days which ECC requests for the Norwich to Tilbury DCO. Providing a longer timescale allows the authority to have sufficient time for necessary internal procedures to consider an application and has been achievable when working on Bramford to Twinstead. It also avoids the need to request repeated extensions of time which ECC has had to | Under Discussion |

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| | | critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.<br>In developing the Order limits and drafting this provision and its associated Schedule 5, the Applicant has sought to identify all streets within which works would be necessary and has included those within the Order limits. However, to accommodate the situation where other works potentially outwith the Order limits are required, the Article as drafted allows for this.<br>Where that scenario occurs, the Applicant's expectation is that planning permission (and indeed any further ancillary consents) will be required where works to be undertaken within any part of the highway outside of the Order limits comprise development within the meaning of Section 55 of the Town and Country Planning Act 1990. However, it would not be appropriate for the draft Development Consent Order to attempt to address all such eventualities (especially those which are already controlled as a matter of general planning law) and, particularly, to prescribe steps to be taken in respect of operations outside of | seek in respect of Longfield Solar Farm. Even with the longer time period in the Bramford to Twinstead DCO, extensions of time have been needed.<br>Further clarity is required on the process for works to take place outside the Order limits as referenced in Article 11 (2). ECC's concern is that the assessment of the works is based on the Order limits and anything beyond that will not have been reviewed as part of the DCO process. | |

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| | | the Order limits. | | |
| 10 | DCO Wording – Application of Permit Schemes | National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. | Article 12. Application of Permit Schemes<br>ECC operates an established Permit Scheme which applies to all adopted streets. It applies to all works promoters, including the Highway Authority (ECC's own works). It involves the promoter applying for a permit to occupy the highway within a specified timescale for different levels of activity. Activities that require a Temporary Traffic Regulation Order ("TTRO") are defined as "Major Activities".<br>The Permit Scheme requires submission of a Provisional Advance Authorisation (PAA) at least three months in advance of a proposed activity, and a permit ten working days before the activity is due to start. As currently drafted, the DCO references the Permit Scheme and in doing so accepts the timescales associated with it. However, the TTRO (at Article 16(8) does not give the standard timescales expected for Permit Schemes. ECC are not able to agree to shorter timescales as the Authority deals with many requests from promoters and the standard timescales given allow sufficient time to deal with the full workload involved. As already shown through the cumulative impact section there is expected to be an overlap of works in Essex of other NSIPs, Garden Communities and Strategic Sites. These works are aside from the many other smaller scale developments and utility works which will all require Permit Scheme | Under Discussion |

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| | | | applications. Following ECC's established standard processes rather than trying to set up new processes with tighter deadlines will provide a more streamlined approach and collaborative working.<br>It is therefore requested that the timescales for the TTROs are altered to reflect ECC's standard timescales for the Permit Scheme and that the wording reflects that the Temporary Traffic Regulation Order is part of the Permit Scheme. | |
| 11 | DCO Wording – Temporary closure of streets and public rights of way | National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's | Article 16 Temporary closure of streets and public rights of way<br>ECC do not accept the 28-day timescale as noted at Article 16(8) in relation to a street authority failing to respond to an application for consent. This is on the basis that a Temporary Traffic Regulation Order for temporary closure of streets would be required and as already highlighted above (under Article 12) is intrinsic within the Permit Scheme which takes 3 months to process. The Temporary Traffic Regulation Order for public rights of way would also require up to 3 months to process.<br>It has to be acknowledged that any closure of access will be difficult for residents – especially where the access is being used for a site compound which could be situated somewhere else/ or where it is for a vague/open-ended period. It is therefore requested that the length of time for a temporary closure is specified in the dDCO.<br>With reference to Art 16 (6), there have | Under Discussion |

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| | | programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.<br>The Applicant acknowledges that closures to streets and public rights of way can be disruptive to regular users. However, ECC will appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary closure. Some temporary closures will be very short, whilst others may need to be slightly longer. 7.3 Outline Construction Traffic Management Plan [APP-309], which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out further details on these temporary closures.<br>The wording of Article 16(6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC. | been discussions through the PRoW Management Plan around providing 4m wide routes for bridleways which may be a betterment to existing in some cases - however, this is because the horses need space to turn due to spooking associated with the construction works. In effect this is mitigation. This clause is potentially at odds with this 4m requirement and as such should be reworded | |
| 12 | DCO Wording – Construction alteration and maintenance of streets and other structures | Article 18(1) and (2) each include an "unless otherwise agreed with the street authority" caveat to the maintenance provision for streets constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by | Article 18 Construction alteration and maintenance of streets and other structures<br>The wording of Article 18 does not set out how infrastructure will be maintained by the Applicant where the authority does not wish to adopt it. This will occur in particular with | Under Discussion |

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| | | Article 27 (Temporary use of land by National Grid) to reinstate the land to the reasonable satisfaction of the owners of the land.<br>The Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. The **7.3 Outline Construction Traffic Management Plan [APP-309]** further notes that the Main Works Contractor will liaise with the relevant highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. | the proposed footway/cycleway provision on Bentley Road which is to remain temporarily in place until the works have been completed, because the infrastructure is only needed whilst the works are taking place due to the high level of HGV activity and the impact on cyclists. ECC require the infrastructure to be maintained by the Applicant until such time as it is removed and the land returned to its previous state so wording in the dDCO should be made clear.<br>The completion of works and maintenance timescale is more complex due to the need for multiple DCOs to use the proposed infrastructure. Further clarity is required on how these matters will be managed, and evidence in the form of a collaboration agreement between the various DCOs benefiting from the proposed mitigation. The infrastructure should be maintained at the same excellent standard as required by the LHA and with continuity between each DCO. The above should be included in the DCO to ensure that the mitigation measures proposed will remain in good order for the duration of their availability to the public. | |
| 13 | DCO Wording – Discharge of Water | National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 | Part 4 Supplemental Powers<br>Article 20 Discharge of water<br>5.5.1 The timings set out within Article 20(9) must be increased to 42 days to give sufficient time for the Lead Local Flood Authority to consider any application for consent under this part of the DCO without having to arrange for an extension to the | Under Discussion |

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| | | business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. | decision making period. This request reflects the available internal resourcing and the increase in time would also bring the DCO in line with other DCOs, such as Bramford to Twinstead. | |
| 14 | DCO Wording – Defence to proceedings in respect of statutory nuisance | An Outline Noise and Vibration Management Plan is provided at **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. This outline management plan will be progressed as all other outline management plans will be and will be controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order. | 5.6 Part 6 Miscellaneous and General<br>Article 48 Defence to proceedings in respect of statutory nuisance (s82 EPA 1990)<br>5.6.1 Given the extent of this article, ECC suggests that a Noise and Vibration Management Plan should be prepared, as envisaged in the Applicant's Environmental Statement (APP-306). | Under Discussion |
| 15 | DCO Wording – Traffic | Given the scale of the Project, the programme pressures and constraint costs that become payable | Article 49 – Traffic Regulation | Under Discussion |

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| | Regulation | for each day that the Project's energisation is delayed (all of which are explained in more detail elsewhere in this SOCG), the Applicant cannot accept a 12 week period in Article 49 (traffic regulation). | 5.6.2 ECC require the timescales at 49(10) for dealing with the permanent TROs to be 12 weeks to align with the Temporary Traffic Regulation Order process. This is to take account of resource and the cumulative impacts that are discussed at length in this LIR.<br>5.6.3 At Article 49(10) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and the requirement to consult with external consultees including the Police. It is requested this period be extended to 42 days. | |
| 16 | DCO Wording – disapplication of legislation | ECC comments on the disapplication of The Hedgerow Regulations are noted.<br>The Applicant awaits ECC's comments at Deadline 4. | The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC is reviewing the Hedgerows Regulations Report (APP-161) and will expand within the ECC Local Impact Report.<br>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination | Under Discussion |
| 17 | DCO Wording – Felling or | In practice, the term 'near' is intended to relate to, for example, roots that cross beneath the Order limits or | Article 50 – Felling or Lopping<br>5.6.4 ECC recognised that this Article allows | Under Discussion |

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| | Lopping | canopies that cross over the Order limits and to which the inclusion in the draft Development Consent Order of an arbitrary distance would be impractical and potentially cause significant delays to the construction of the authorised development. A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. The article does not authorise the Applicant to do anything that is not necessary.<br><br>The Applicant has already commented on the 28 day decision period elsewhere in this SOCG and so does not repeat its justification here.<br><br>Given affected vegetation and how it is affected is clearly shown on **2.16 Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]** (i.e. "affected managed" or "potentially affected", it is unclear why a definition of "affected vegetation" is required. | for wide powers to do the tree work which the undertaker reasonably believes to be necessary and this consequently gives the Applicant powers to lop prune, cut, trim, coppice, pollard, reduce in height or width any tree shrub, shrubbery, hedgerow or important hedge under or within the overhanging or near part of the authorised development if it reasonably believes it necessary to do so to prevent obstruction/interference with construction, operation or maintenance of authorised development or any apparatus or from constituting a danger to persons constructing maintaining or operating the authorised development.<br><br>5.6.5 While a caveat about not causing unnecessary damage to trees / vegetation is included as is the requirement for consent where works involving trees / vegetation overhanging the highway, ECC maintains a concern that the use of the term 'near' is too ambiguous. This will lead to uncertainty and the potential for more works to be undertaken than absolutely necessary. As such, ECC consider that 'near' should either be removed, or defined as a specific value e.g. 2m, with works only occurring with some prior notice to the relevant LPA.<br><br>5.6.6 An open-ended option for vegetation to be removed without the impact of this being appraised is not supported as the impacts on protected hedgerows requires proper assessment. | |

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| | | | 5.6.7 It is also noted that the areas marked 'affected vegetation' would need careful review once available and it assumed that any additional works would be within the parameters of the approved OLEMP.<br>5.6.8 At Article 50(5) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and it is requested this period be extended to 42 days to allow for the appropriate consultation to take place with and to avoid the need to request extensions of time which has been the experience of the Authority when dealing with the discharge of Requirements under this Article on other NSIP schemes.<br>5.6.9 It is also considered the term 'affected vegetation' should be defined.<br>5.6.10 There is concern that as drafted, this section gives extensive powers and unless further defined in the Trees / Hedgerows to be Removed / Management Plans (i.e. to define limits to the extent of pruning of TPO beyond which prior approval would be required), the powers could result in harm to TPO trees with significant visual amenity. This will need to be reviewed once the Trees / Hedgerows to be Removed / Management Plans are submitted. | |
| 18 | DCO Wording – Felling or Lopping / Trees subject to Tree Preservation | The Applicant refers to it response to ECC's comments on Article 50 above.<br>The Applicant does not consider it necessary to include a notice provision and notes that such provisions are | Article 50 Felling or Lopping / 51 Trees subject to Tree Preservation Order Reinstatement and Compensation<br>5.6.11 Article 51 permits an undertaker to | Under Discussion |

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| | Orders | not included in other recent development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. | carry out extensive tree works to TP trees if it reasonably believes it is necessary to do so in connection with the implementation of the DCO and gives deemed consent to do so. Owing to the special importance of trees subject to TPOs, a definition of "near" is required for the avoidance of doubt (ideally defined as a specific value e.g. 2m for example, or as otherwise agreed).<br>5.6.12 Additional wording should also be included in this Article to the effect that advance notice of proposed works must be given to the Local Planning Authority and opportunity given for the planning authority to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work). | |
| 19 | DCO Wording - Safeguarding | The Applicant does not follow why more than two business days is required in this instance. The Council's proposed drafting prevents them from determining the application for a further three business days than is proposed by the Applicant.<br>The Applicant acknowledges ECC's position on Article 56(5).<br>The term "business days" is used elsewhere in the draft Development Consent Order. | Article 56 Safeguarding<br>5.6.13 Article 56(3)(b) should be amended as follows: "they may not determine the application before the end of the period of 21 days, beginning five business days after the relevant planning authority has sent the notice to the undertaker by first class post or by such other means of service as may be agreed with the relevant planning authority, which will be deemed to be the date on which the undertaker receives the notice or copy of the application." This is to ensure that adequate time is offered for all parties engaged in the process.<br>5.6.14 ECC notes and accepts the following amend made to Article 56(5) "In determining an application for planning permission a | Under Discussion |

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| | | | relevant planning authority must take into account any representations received in accordance with this article".<br>5.6.15 The term "business days" is used in this Article but not elsewhere in the dDCO. ECC recommends that all time limits are expressed consistently | |
| 20 | DCO Wording – Service of Notices | The Applicant notes ECC's position. | Article 61 Service of Notices<br>5.6.16 It is acknowledged direct email contacts/ methods of service between the Essex Authorities and Undertaker to promote efficient communication is required with a preference for email communication. | Agreed |
| 21 | DCO Wording – protective provisions | ECC comments on the protective provisions are noted, and National Grid will continue to engage with ECC on this matter. | As highway authority, ECC welcomes draft Protective Provisions but these need to be the subject of further discussion between ECC and the Applicant to ensure appropriate mitigations.<br>As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination | Under Discussion |
| 22 | DCO Wording – Protective Provisions (Drainage and Flood) | The Applicant is liaising with ECC as lead local flood authority and awaits comments on the latest draft protective provisions shared on 3 March 2026. | Schedule 16 Protective Provisions<br>Part 3 for the protection of drainage and flood authorities<br>Approval of Plans<br>Paragraph 3(1)( a) – The Lead Local Flood Authority recommends the inclusion of approval under Section 23 of the Land Drainage Act 199. | Under Discussion |

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| | | | Furthermore, with reference to Paragraph 3(6), where the drainage strategy plan changes the LLFA should be consulted regarding the changes at the earliest opportunity to ensure there is adequate time to consider any request. A minimum of 20 business days is suggested.<br>(Para 5.9.1-5.9.2) | |
| 23 | DCO Wording – Protective Provisions (Highways) | It is the Applicant's understanding that as noted the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the highways authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments which are summarised in ECC's Local Impact Report) to all the Highways Authorities and we await comments.<br>In the absence of a Framework Agreement, the Applicant is considering the comments raised by the Council. | Part 4 for the protection of the highway authorities<br>As mentioned previously, ECC's preference is to enter into a Framework Highways Agreement or similar side agreement with the Applicant to deal with the design approvals rather than the use of Protected Provisions. This is on the basis that ECC expect (as indeed the public would expect) a level of oversight and control of the local highway network. However, we have provided comments on the text in the dDCO should the Protected Provisions be the only route available.<br>The "Approval period" is defined as 14 days for Minor Works and 28 days for Major Works. ECC refer to the discussion points around this at Schedule 11 where ECC have requested that the formal decision period is extended to 35 days to be in line with the Bramford to Twinstead DCO.<br>A description of the types of work that constitutes "early works" is needed as is shown for the pre-commencement definition.<br>The agreed wording from the recently | Under Discussion |

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| | | | consented Five Estuaries DCO (Protected Provisions, Article 131) should be included for the definition of "road safety audits":<br>"(1) The undertaker must procure that an appropriately qualified RSA team (as defined in HPN039 or DMRB Volume 5 Section 2 Part 2 (GG 119) as advised by the local highway authority (acting reasonably) or any replacement or modification of that standard) undertakes road safety audit in accordance with the standard as set out in HPN039 or DMRB standard GG 119 as advised by the local highway authority (acting reasonably) for works which involve creation, alteration, expansion or other modifications of the local highway but not for works which consist only of trenchless installation beneath highways, and must provide copies of the reports of such audits to the local highway authority within 10 business days of their receipt by the undertaker.<br>The local highway authority must be invited to participate in the road safety audit conducted under sub-paragraph (1)<br>No works on a local highway must be commenced out until a satisfactory Stage 1 and Stage 2 Road Safety Audit has been carried out and all reasonable recommendation raised by them or any exceptions are approved by the local highway authority (acting reasonably)<br>Where the report of the stage 3 and 4 road safety audit identifies any recommended measures in respect of the local highway, | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
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| | | | the undertaken must carry out, at its own expense and to the reasonable satisfaction of the local highway authority, those measures identified as part of stage 3 and 4 audit which the undertaker considers necessary (acting reasonably) and for the avoidance of doubt any matters related to the health and safety will be considered as reasonable, and which do not give rise to any new or materially different environmental effects in comparison with those identified in the environmental statement."<br>The definition of "security" includes either (a) a letter of credit; or (b) such other information that evidences the credit standing of the undertaker. This is a non-standard way for ECC to deal with the form of security which is usually required as a bond. ECC notes the Applicant's solicitors were reviewing the form of security through ongoing internal discussions and the drafting was to be updated accordingly where necessary. It does not appear that there have been changes made and the Explanatory Memorandum (Document 3.2) offers no further detail on this point.<br>At paragraph 6 (2) ECC requests that a timescale is included to provide notice to the local authority on pre-commencement works. Currently the statement is vague.<br>Paragraph 8 requires wording to be added around suitably qualified persons to be involved in the initial and formal engagement | |

| ID | Matter | National Grid's Position | Essex County Council's Position | Status |
|---|---|---|---|---|
| | | | with the local highway authority. ECC have had previous experience on other DCOs where there was a lack of knowledge of the design which meant that ECC were having to spend more time dealing with issues. Therefore, we believe this requirement should be tightened up.<br>Paragraph 11 (1b) sets out that the formal approval can only commence when the initial checking fee has been paid. It would appear reasonable to include this requirement in paragraph 10 such that the fee is paid in advance of the time involved for the initial engagement.<br>(Para 5.9.3-5.9.10) | |
| 24 | DCO Wording – Certified Documents | The documents to be certified will be available on the Planning Inspectorate's website. | 5.10 Schedule 19 Certified Documents<br>5.10.1 The dDCO should secure that certified documents remain readily available to local authorities engaged in the discharge of requirement, in the interests of clarity, efficiency of process and transparency. | Under Discussion |

# 5. ~~4.~~ Confirmation of Agreement

This Statement of Common Ground is agreed upon by the undersigned parties:

Signed for and on behalf of National Grid:

……

Date:

……

Signed for and on behalf of Essex County Council:

……

Date:

……

# Abbreviations

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

| Abbreviation | Full Reference |
|---|---|
| WSI | Written Scheme of Investigation |
| ZoI | Zone of Influence |
| ZTV | Zone of Theoretical Visibility |

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