

AENC-NG-CNS-REP-0018

# Norwich to Tilbury

## Volume 5: Reports and Statements

Document: 5.9.6 Draft Statement of Common Ground - Babergh and  
Mid Suffolk District Council - Clean Version

Final Issue C

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**nationalgrid**

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B	26 February 2026	Deadline 1
C	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 the Applicant within this document) and Babergh and Mid Suffolk District Councils (BMSDC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

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

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

## 1.2 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
<b>Project development, description and design</b>		
3.2.10 – Community Benefits	BMSDC notes the Government's emerging position on community benefits, including the Bill Discounts Scheme, and expect the Applicant to provide a reasonable, package of community benefits. These should be additional to the	Matter unlikely to be agreed as it would be delivered outside the

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>necessary mitigation and compensation measures required through the DCO.</p> <p>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 <b>Applicant’s Comments on Local Impact Reports [REP2-030]</b>.</p>	development consent process
3.2.11 – Gateway 14	<p>BMSDC calls on the Applicant to recognise the value of coordinated delivery of interrelated energy projects and network infrastructure for improved connectivity for Freeport East at Gateway 14.</p> <p>The Applicant reiterates that opportunities to rationalise or make new connections to the local network (such as Gateway 14) requires inputs from the developer, the Distribution Network Operators (DNOs) and National Grid to identify a need case to be supported by Ofgem.</p>	Matter unlikely to be agreed. as connectivity for Freeport East at Gateway 14 does not form part of the Norwich to Tilbury Project.
3.2.12 – Bramford substation	<p>BMSDC expects the Applicant to demonstrate measures to protect residents, amenity, businesses, the highway network, landscape and the environment given the volume and nature of development at and around Bramford substation.</p> <p>The Applicant does not have legal authority, regulatory responsibility or funding to control the process of development around the substation, and notes that future development would need to provide cumulative assessment and proposed mitigation.</p>	Resolution is likely by Deadline 7.
<b>Ecology and Biodiversity</b>		
3.3.6 – Survey methodology (bats)	<p>BMSDC have concerns regarding level of bat survey and construction effects upon bats. BMSDC calls for further survey effort which would lead to a better supported estimation of impact and the more confidently proportionate mitigation/compensation.</p>	Resolution likely by Deadline 7.
3.3.9 – Baseline conditions and receptors (bats)	<p>No further bat roosting surveys are being undertaken. 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.</p>	
3.3.12 – Standard mitigation (bats)	<p>The Applicant has provided further clarification on the bat survey scope and notes Natural England’s agreement with</p>	
3.3.14 – Construction effects	<p>the bat roost survey scope.</p>	

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.3.7 – Key parameters and assumptions	<p>BMSDC consider the assumptions regarding reinstatement to be tenuous. BMSDC is reviewing and will provide further comment following consideration around reinstatement.</p> <p>The Applicant maintains that the key parameters and assumptions presented are considered appropriate and has committed to a 5-year aftercare period for all replacement tree and hedgerow planting and to a 30-year aftercare period at Environmental Areas.</p>	Resolution likely by Deadline 7.
3.3.16 – Outline CoCP	<p>BMSDC seeks further clarification regarding Ecological Clerk of Works.</p> <p>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).</p>	Resolution likely by Deadline 7.
3.3.17 – Outline LEMP 3.3.18 – Biodiversity Net Gain – onsite and assessment	<p>BMSDC raised concerns regarding the criteria used to define the bat hibernation potential of trees.</p> <p>The Applicant reiterates that Natural England have approved the classification method of a risk-based approach being taken when assessing trees for their hibernation potential for bats.</p>	Resolution likely by Deadline 7.
3.3.19 - Biodiversity Net Gain - offsite	<p>BMSDC requests clarification around off-site BNG.</p> <p>The Applicant notes that this will be secured by legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.</p>	Resolution likely by Deadline 7.
3.3.20 – Arboriculture Impact Assessment	<p>BMSDC position pending.</p>	Resolution likely by Deadline 7.
<b>Noise and Vibration</b>		
3.5.1 – Policy and legislation and 3.5.5 – Key parameters and assumptions	<p>BMSDC sought clarification on the definition of significant noise.</p> <p>The Applicant reiterates that significant effects are defined in <b>Section 4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and are based on applicable guidance.</p> <p>The Applicant maintains that the parameters and assumptions presented are considered appropriate.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.5.6 – Baseline conditions and receptors	<p>BMSDC raised concerns that not requested all receptor locations have been supplied.</p> <p>The Applicant signposts to <b>ES Figure 6.14.F1 Environmental Statement Figure 14.1 – Baseline Noise Data [APP-262]</b> where all receptor locations are presented and considered appropriate.</p>	Resolution likely by Deadline 7.
3.5.12 – Outline CoCP	<p>BMSDC requests amendments to the working hours.</p> <p>The Applicant would like to note that reducing working hours on a Saturday would not be practical as it would significantly limit the available time to carry out construction activities.</p>	Matter unlikely to be resolved.
<b>Health and Wellbeing</b>		
3.6.6 – Baseline conditions and receptors	<p>BMSDC raised concerns that the baseline does not include impacts on non-resident populations.</p> <p>The Applicant considers the baseline condition and receptors presented are appropriate. The Applicant notes that impacts on tourism are assessed in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p>	Resolution likely by Deadline 7.
3.6.10 – Construction effects	<p>BMSDC do not accept that the conclusion that health and wellbeing effects would not be significant.</p> <p>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.</p>	Matter unlikely to be agreed.
3.6.11 – Operational (and maintenance) effects	<p>BMSDC is reviewing the operational (and maintenance) effects relating to health and wellbeing and will provide the Applicant with an update once complete.</p>	Resolution likely by Deadline 7.
3.6.13 – EMF assessments	<p>BMSDC request a site-specific risk assessment is undertaken to appropriately assess the potential exposure to electromagnetic radiation.</p> <p>The Applicant maintains that the Project meets all relevant EMF exposure limits set out in ICNIRP guidance.</p>	Matter unlikely to be agreed.
<b>Historic Environment</b>		
3.7.7 – Embedded mitigation	<p>BMSDC request further details regarding the embedded mitigation where a Mid Level of less than substantial harm has been identified to the significance of heritage assets.</p> <p>BMSDC is reviewing <b>5.15 Design Development Report [APP-122]</b> which addresses the main changes requested and considers all factors relevant to the changes. The Applicant maintains that the embedded mitigation is considered</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	appropriate and adequate, in terms of its nature and scale, to address potential effects.	
3.7.8 – Standard mitigation (built heritage)	<p>BMSDC made recommendations regarding commitments H06 and H07 which the Applicant has responded to.</p> <p>The Applicant maintains that the standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Regarding commitment H06 the term ‘appropriate’ in this context refers to the reinstatement of landscape features in a sensitive manner. Regarding H07, <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> did not identify any heritage assets in BMSDC that are residences that would be impacted by the Project. The current approach in H07 is considered appropriate.</p>	Resolution likely by Deadline 7.
3.7.11 – Operational (and maintenance) effects (built heritage)	<p>BMSDC disagrees with the assessment of harm to Hall Farm House (1181726) and Barn about 30m West of Hall Farm House (1032806).</p> <p>The Applicant maintains that the assessment of effects during operation (and maintenance) presented is considered appropriate given the distances from the pylons.</p>	Matter unlikely to be resolved.
3.7.12 – Outline CoCP	<p>BMSDC note that no structure or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.</p> <p>The Applicant maintains that <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction mitigation measures specified in <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> and is appropriate for managing construction impacts from the Project. The Applicant will continue to liaise with BMSDC on this matter.</p>	Matter unlikely to be resolved.
<b>Landscape and Visual</b>		
3.8.1 – Policy and legislation	<p>BMSDC’s position is that the proposals do not comply with EN-1 paragraph 4.3.4. The Applicant’s position is that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	Matter is unlikely to be agreed during Examination.
3.8.2 – Study area	<p>Generally BMSDC 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.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.8.3 – Data sources	<p>BMSDC is concerned about gaps in viewpoint distribution and with the approach to landscape value and value of the view. BMSDC also requests improvements to presentation to improve access and interpretation.</p> <p>The Applicant states that the request for 1:10,000 scale mapping for <b>6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]</b> was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure.</p>	Resolution likely by Deadline 7.
3.8.4 – Assessment methodology (including LVIA methodology and viewpoints) 3.8.6 – Baseline conditions and receptors 3.8.11 – Operational (and maintenance) effects	<p>BMSDC has reservations regarding the methodology for assessing the value of views and the number of viewpoints.</p> <p>The Applicant is confident the assessment of landscape value is based on a robust and consistent approach, with clear transparent criteria and assessment grades, in line with the Landscape Institute’s TGN 02/21 Assessing Landscape Value Outside National Designations. Recognition of the value of views was determined with reference to a number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan.</p>	Resolution likely by Deadline 7.
3.8.5 – Key parameters and assumptions	<p>BMSDC is reviewing the key parameters and assumptions relating to landscape and visual and will provide the Applicant with an update once complete.</p>	Resolution likely by Deadline 7.
3.8.7 – Embedded mitigation 3.8.8 – Standard mitigation 3.8.9 – Additional mitigation 3.8.10 – Construction effects 3.8.11 – Operational	<p>BMSDC considers mitigation measures are not addressing substantial significant negative residual impacts. The Applicant considers the mitigation measures appropriate and adequate.</p> <p>BMSDC retains concerns on landscape and visual compensation. The Applicant considers that the mitigation hierarchy has been systematically applied throughout the design of the Project with wide levels of public and stakeholder engagement. Compensatory measures have been considered as part of the development of the Project but the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
(and maintenance) effects		
3.8.12 – Outline CoCP	BMSDC 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.
3.8.13 – Outline LEMP	BMSDC 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. The Applicant maintains that all relevant measures are appropriate.	Matter is unlikely to be agreed during Examination.
<b>Socio-economics, Recreation and Tourism</b>		
3.9.1 – Policy and legislation	BSMDC state that no Economic Strategies, Tourism/Visitor Economy Strategies, Skills plans or needs analysis have been reviewed as part of the assessment of regional and local policy, only Local Plans. This potentially skews the understanding of the existing economy and therefore the potential impact from this development. The Applicant has reviewed the Babergh & Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy and these broadly align with the Local Plan. It is considered that there are no material changes to the conclusions of the Socio-economics, Recreation and Tourism assessment.	Resolution likely by Deadline 7.
3.9.2 – Study area	BMSDC recognise that the Local Study Area has been expanded to a 3km radius as opposed to the 500m radius initially proposed. This is welcomed, but the Councils believe that this is still unacceptable. The Applicant maintains the Local Study Area is appropriate.	Resolution likely by Deadline 7.
3.9.3 – Data sources	BMSDC have concerns regarding the validity of data used. The Applicant considers the data used to form the assessment robust.	Resolution likely by Deadline 7.
3.9.4 – Assessment methodology	BMSDC has concerns with the assessment criteria. The Applicant recognises that employment sectors differ in their proportionality and local importance across areas such as Mid Suffolk, Thurrock, and Basildon. Baseline data for each LPA has been gathered. To ensure consistency, a standard approach is applied across the Wider Study Area within the assessment.	Resolution likely by Deadline 7.
3.9.5 – Key parameters	BMSDC asked for the assumptions to be reassessed based on cumulative impact from multiples NSIPs.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
and assumptions	The Applicant directs BMSDC to the assessment of cumulative effects set out in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> .	
3.9.6 – Baseline conditions and receptors	BMSDC requests updated data sources inform the assessment. The Applicant states that the assessment has used the most recent and reputable publicly available sources at the time of writing.	Resolution likely by Deadline 7.
3.9.8 – Standard mitigation	BMSDC notes standard mitigation but does not believe it is sufficient to mitigate impacts. The Applicant considers the standard mitigation to be appropriate and adequate.	Resolution likely by Deadline 7.
3.9.10 – Construction effects	BMSDC has concerns regarding the assessment. The Applicant recognises the importance of skills development and workforce planning and is committed to supporting these; the level of employment during construction is not considered significant when compared with other sectors.	Resolution likely by Deadline 7.
3.9.11 – Operational (and maintenance) effects	BMSDC has concerns regarding the assessment. The Applicant recognises that there could be indirect economic effects to individual businesses however, the Applicant considers the assessment of effects to be appropriate. Through routeing, siting and detailed design, the applicant has sought to reduce, as far as practicable, potential impacts on visitor attractions.	Resolution likely by Deadline 7.
3.9.12 – Outline CoCP	BMSDC have made no comments in their Relevant Representations or their Local Impact Report regarding these matters which inform the application. The Applicant proposes these matters are therefore moved to Agreed.	Resolution likely by Deadline 7.
<b>Cumulative Effects</b>		
3.10.1 – Policy and Legislation	BMSDC have made no comments in their Relevant Representations or their Local Impact Report regarding these matters which inform the application.	Resolution likely by Deadline 7.
3.10.3 – Data Sources	The Applicant proposes these matters are therefore moved to Agreed.	
3.10.5 – Key parameters and assumptions		
3.10.6 – Baseline conditions and receptors		

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.10.7 – Embedded mitigation		
3.10.8 – Standard mitigation		
3.10.9 – Additional mitigation		
3.10.10 – Construction effects		
3.10.11 – Operational (and maintenance) effects		
3.10.12 – Outline CoCP		

## 1.3 Project Description

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

## 1.4 Format and Structure of this Document

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

## 2. Record of Key Engagement

### 2.1 Introduction

- 2.1.1 The Applicant has engaged with BMSDC 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 the Applicant 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 the Applicant and BMSDC. For some topics BMSDC are represented by Essex Place Services (EPS).

Table 2.1 Summary of Key Engagement between National Grid and BMSDC

Date	Format	Topic/description
<b>General</b>		
June 2022	Meeting	Informal project catch-up and PPA discussion
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
October 2023 – Ongoing	Meeting	Monthly informal catch-up meetings.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	The Applicant 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	Connection agreement discussion.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	The Applicant issued the SoCC to all host authorities for statutory consultation.
April 2024	Meeting	Mid Suffolk DCO discussion.
May 2024	Meeting	All host authority workshop.
June 2024	Meeting	Mid Suffolk DCO discussion.
September 2024	Email Correspondence	The Applicant issued the draft Outline Code of Construction Practice (CoCP) and draft Outline Landscape and Ecological Management Plan (LEMP) to all host authorities for comment.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	The Applicant shared the 2nd iteration draft versions of the Outline LEMP and Outline CoCP.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the 2nd iteration of the Outline LEMP and Outline COCP.
March 2025	Meeting	All host authority workshop
May 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
May 2025	Meeting	All host authority workshop
June 2025	Email Correspondence	The Applicant issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	The Applicant issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
November 2025	Email	BMSDC provided their Relevant Representations to the Applicant following submission to PINS.
December 2025	Meeting	Meeting to progress SoCG (general)
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the Traffic, Transport and ProW sections of the Environmental Statement
November 2025	Meeting	All host authority workshop
December 2025	Meeting	Meeting to progress SoCG
January 2026	Meeting	All host authority workshop
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	Joint meeting with SCC to agree deadline 4 Statement of Common Ground approach
March 2026	Meeting	All host authority workshop
April 2026	Meeting	Meeting to discuss options for mitigation around Bramford substation
<b>Ecology and Biodiversity</b>		
July 2022	Email Correspondence	The Applicant shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - The Applicant presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from BMSDC and other authorities.
September 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant 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	The Applicant shared the Outline LEMP
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	The Applicant issued the Protected Species Proposed Mitigation Measures to stakeholders including BMSDC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant issued the BNG Strategy to stakeholders including BMSDC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the draft Biodiversity Net Gain Report.
January 2025	Email Correspondence	The Applicant shared the 2 <sup>nd</sup> iteration of the Outline LEMP
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the 2 <sup>nd</sup> iteration of the Outline LEMP
May 2025	Meeting	The Applicant hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	The Applicant shared the next iteration of the Outline LEMP, including Appendix D – Outline Landscape Proposals

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
September 2025	Meeting	Option thematic group meeting to discuss feedback on the ecology section of the Environmental Statement.
January 2026	Meeting	Meeting to discuss the ecology aspects of the Statement of Common Ground (attended by EPS)
<b>Air Quality</b>		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Air Quality assessment for review and comment.
<b>Noise and Vibration</b>		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
<b>Health and Wellbeing</b>		
September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment, including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	The Applicant 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	The Applicant 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.
<b>Historic Environment</b>		
July 2022	Email Correspondence	The Applicant 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	The Applicant 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	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
		the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	The Applicant shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
October 2024	Meeting	Historic Environment Thematic Group Meeting – aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
February 2025	Technical Note	The Applicant shared the Heritage viewpoints documents and shapefiles.
February 2025	Meeting	Historic Environment Thematic group meeting to discuss Heritage viewpoints
February 2025	Technical Note	The Applicant shared the draft Historic Environment Baseline Report.
February 2025	Meeting	Meeting to discuss the draft Historic Environment Baseline Report.
March 2025	Email Correspondence	The Applicant issued updated Historic Environment Viewpoints information to stakeholders including BMSDC.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
June 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
June 2025	Technical Note	The Applicant shared the Archaeological Fieldwork Summary (review undertaken by EPS).
June 2025	Technical Note	The Applicant shared additional trench plans for Site 008, Area 22, north of the River Stour.
July 2025	Meeting	Archaeology Working Group Meeting
July 2025	Technical Note	The Applicant shared the combined SSWISI for Sites 005, 006 and 007 and associated trench plans.
July 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
August 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
September 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
October 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
November 2025	Meeting	Archaeology Working Group (meeting attend by EPS)
November 2025	Technical Note	The Applicant shared the WSI for the Phase 2 Geophysical Survey
November 2025	Technical Note	The Applicant shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
January 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with Essex Place Services
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with SCC
January 2026	Meeting	Follow up meeting to discuss built heritage aspects of the Statement of Common Ground with Suffolk County Council

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
January 2026	Meeting	Meeting to discuss the archaeology aspects of the Statement of Common Ground.
February 2026	Meeting	The Applicant 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.
February 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
March 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
<b>Landscape and Visual</b>		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
May 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	The Applicant 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	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	The Applicant responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
September 2024	Email Correspondence	The Applicant 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	The Applicant held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the development consent application.
September 2024	Email Correspondence	The Applicant shared the shapefiles for the landscape viewpoints and order limits following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Suffolk.
October 2024	Meeting	Focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	The Applicant shared updated viewpoint information data following from the landscape thematic workshops
November 2024	Meeting	Thematic group meeting to discuss viewpoints and methodology – Suffolk.
January 2025	Email Correspondence	The Applicant shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology.
March 2025	Email Correspondence	The Applicant issued the draft Arboricultural Impact Assessment.
May 2025	Email Correspondence	The Applicant shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
January 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground with EPS.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
March 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground with EPS.
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BMSDC's Local Impact Report
<b>Socio-economics, Recreation and Tourism</b>		
July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant 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.
June 2023	Technical Note	The Applicant 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	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	The Applicant 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	The Applicant issued the third Technical Note for Socio-economics, Recreation and Tourism to stakeholders including BMSDC.
October 2025	Meeting	Option thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement.

# 3. Matters Agreed, Not Agreed or Under Discussion

## 3.1 Overview

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

Table 3.1 Agreement status for matters presented in Section 3

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

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 Table 3.2 to Table 3.10 provides the matters agreed, not agreed or under discussion in relation to the various topics.

## 3.2 Project development, description and design

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Strategic options/needs case</b>				
3.2.1	Needs case	<p>Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia.</p> <p>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p> <p>For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b></p>	<p>BMSDC Response to Targeted Consultations (March 2025):</p> <p>BMSDC acknowledge the stated need case for a scheme of electricity transmission network capacity improvement to enable connection of offshore wind generation, required to meet net zero commitments, and to increase capacity of the transmission network to meet this additional demand, as reiterated by the Hiorns report.</p>	Agreed
3.2.2	Project timing	<p>Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. The Applicant is legally</p>	<p>BMSDC Response to Targeted Consultations (March 2025):</p> <p>BMSDC suggest the project is premature, whilst there is a known and recognised likelihood of alternative technologies and / or infrastructure design</p>	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.</p> <p>Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.</p> <p>For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b></p>	<p>arrangements, that a strategic approach to energy infrastructure planning through the responsibilities of the imminent National Energy System Operator (NESO) and Regional Energy Strategic Planner (RESP) functions, and recognising the findings of the Hiorns report that the need for additional transmission capacity is more likely be closer to 2035 than National Grid's programme delivery date of 2030.</p>	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p>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.</p> <p>For the Applicant's position on the onshore route, please refer to Section 3.3</p>	<p>Whilst BMSDC recognise the findings of the East Anglia study the councils maintain a preference for a coordinated offshore solution.</p>	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.2.4	Predominantly overhead line route	<p data-bbox="524 220 1128 325">'Alternatives – Offshore Alternatives' in Applicant's Comments on Local Impact Reports [REP2-030]</p> <p data-bbox="524 357 1128 644">Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p data-bbox="524 660 1128 874">Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p> <p data-bbox="524 890 1128 1289">The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p data-bbox="524 1305 1128 1409">For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice –</p>	<p data-bbox="1151 357 1899 421">BMSDC Response to Targeted Consultations (March 2025):</p> <p data-bbox="1151 437 1899 501">BMSDC would prefer more undergrounded sections of the route.</p> <p data-bbox="1151 517 1899 660">BMSDC acknowledge the concerns of our communities regarding the impact of overhead line development and will continue to request consideration of undergrounding where appropriate.</p>	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Overhead Line and Underground Cables' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b>		
<b>Project development process - Design</b>				
3.2.5	Waveney Valley	<p>At the statutory consultation in 2024, the Applicant presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation techniques for underground cables in response to GI surveys and the Waveney and Little Ouse Recovery project.</p> <p>For the Applicant's position on the Waveney Valley, please refer to Section 3.5 'Alternatives – Waveney Valley' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b></p>	<p>BMSDC Response to Targeted Consultations (March 2025):</p> <p>The omission of the Waveney Valley alternative is disappointing, and the councils will continue to request consideration of undergrounding where appropriate</p>	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Project development process - Consultation</b>				
3.2.6	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. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	No reason to dispute. No other comments	Agreed
3.2.7	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, and responses to feedback received during consultation are included in the Feedback Report. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	No reason to dispute. No other comments	Agreed
3.2.8	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). Responses to feedback received during statutory consultation is contained within the Consultation Report <b>[APP-066]</b> .	BMSDC look forward to seeing the consultation feedback report. No reason to dispute. No other comments	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		The statutory consultation was undertaken in accordance with the published SoCC.		
3.2.9	2025 targeted consultation	<p>Targeted consultations for Suffolk took place from 30 January 2025 – 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation is contained within the <b>Consultation Report [APP-066]</b>.</p> <p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy.</p> <p>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).</p>	No reason to dispute. No other comments	Agreed
<b>Other matters as required</b>				
3.2.10	Community Benefits	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 consideration in the decision on the	The councils recognise the emerging position from government towards a package of recommendations for community benefits from electricity transmission infrastructure development, including the Bill Discounts Scheme. If the councils' communities are to host this development NGET should offer a reasonable, proportionate and practicable package of community benefits, outside the scope of the	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>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.</p>	<p>necessary and expected mitigation and compensation measures for the DCO.</p>	
3.2.11	<p>Supply and connectivity around the Freeport at Gateway 14</p>	<p>The Applicant liaises regularly with electricity Distribution Network Operators (DNO). In East Anglia that is UK Power Networks (UKPN). Potential opportunities to rationalise, or make new connections to, the local network, or high demand centres, such as Gateway 14 requires a combination of the developer, the DNO and The Applicant identifying a need case that would be supported by the regulator, Office of gas and electricity markets (Ofgem), or funded by some other means. The Applicant is required under its transmission licence, to make connections where applications are made including to local networks or demand centres. If a connection application is made, the Applicant would progress it accordingly.</p>	<p>BMSDC Response to Targeted Consultations (March 2025):  BMSDC consider potential benefits, through appropriately coordinated delivery of interrelated energy projects and network infrastructure, could include improved connectivity for Freeport East at Gateway 14 as well as other major commercial operations and other interests in the area.  BMSDC are calling on NGET to recognise and act upon the value such strategic coordination will add to the Norwich to Tilbury project, the wider Great Grid Upgrade objectives by enabling effectively, appropriate and sustainably planned local generation and storage for focused local distribution and consumption as part of the government's priorities for a decarbonised economy and to contribute to the challenge of fuel poverty.</p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.2.12	Bramford substation	<p>The Energy Market is a free market where applicants apply to connect to the transmission system. The Applicant is obliged to connect any generation customer who signs a connection offer from the National Energy System Operator. The connecting generation customers fund their projects independently and must secure the appropriate land rights and necessary planning approvals such as a Development Consent Order or planning approval under the Town and Country Planning Act 1990 considering cumulative effects with other developments as necessary. The Applicant has neither legal authority, regulatory role nor funding to exert control over this process in the manner suggested but notes that those with planning approval responsibilities can influence the outcome and secure co-ordination to some degree.</p> <p>Other unknown future development that comes forwards and seeks to connect into Bramford Substation would be subject to its own consenting and / or approval process which would likely need to provide its own cumulative assessment and implement any appropriate mitigation to avoid, prevent, reduce and / or offset (where relevant and appropriate) adverse effects on the environment.</p>	<p>Given the volume and nature of reasonably foreseeable development at and around the Bramford substation a strategic approach to the project design and delivery, having regard to the cumulative impacts and interactions with other developments in the area, is considered necessary to minimise impacts on the surrounding communities, public safety, landscape, heritage and highway network.</p> <p>In particular, the councils expect NGET to demonstrate measures are in place to protect residents, amenity, businesses, the highway network, landscape and environment having regard to the need to safeguard access to the sub station in the interest of resilience of the transmission network as critical infrastructure.</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		The Applicant welcomes ongoing engagement with BMSDC in relation to this matter.		
3.2.13	Furthering the purposes of the National Landscape	<p>The Applicant consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of the CRoW Act, is set out in <b>5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (APP-120)</b>. Part of this approach includes the provision of a Dedham Vale National Landscape Fund in addition to the commitment to an initial feasibility study to assess feasibility for the potential PJ Line removal, an existing UK Power Networks overhead line running between Lawford and south of Bramford. The measures identified are sufficient, appropriate and proportionate in accordance with Defra guidance and national policy.</p> <p>The approach follows the Defra guidance (Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes) with the additional measures proposed to be secured by a legal agreement. Engagement with the Dedham Vale National Landscape</p>	<p>Babergh District Council welcomes the proposed funding of a feasibility study for the removal/rationalisation of existing 132kV overhead lines east of Bramford Substation.</p> <p>Mid Suffolk: N/A.</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>Partnership and relevant stakeholders is ongoing.</p> <p>For the Applicant's position on furthering the purposes of the National Landscape, please refer to Section 3.11 'Furthering the Purposes of the National Landscape' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b></p>		

### 3.3 Ecology and Biodiversity

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.3.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity of the ES [AS-026]</b>.</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The ES has identified the relevant legislation, policy and guidance.</li> </ul> <p>BMSDC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Approach and Methods</b>				
3.3.2	Study area	The study area was agreed through the EIA <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> 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 (Desktop)	Sufficient desktop data has been collected to inform the assessment as presented within <b>Section 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> .	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: <ul style="list-style-type: none"> <li>• Sufficient desktop data has been collected for the ES.</li> </ul>	Agreed
3.3.4	Assessment methodology	The methodology for assessing Ecology and Biodiversity was agreed through the EIA <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Ecology and Biodiversity was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	<p>The Applicant issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. The methodology and scope were subsequently agreed with local authorities.</p> <p>In response to the comments received regarding identification of smaller ancient woodland parcels, The Applicant has undertaken field survey work across 2023 – 2025, including habitat assessments of</p>	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: <ul style="list-style-type: none"> <li>• The survey methods used are largely accepted, although note the comments made for ID 3.3.6.</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		woodland blocks, to identify any smaller pockets of ancient woodland that are not currently on the Ancient Woodland Inventory.		
3.3.6	Survey Methodology (Bats)	<p>The bat roost survey scope was agreed with Natural England, as evidenced within <b>5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]</b>, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken.</p> <p>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. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> includes a reasonable worst-case assessment of impacts on potential roost features.</p> <p>The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, BMSDC 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.</li> <li>• Place Services Ecology comments 01/05/26 - The discourse with the Applicant has moved away from the bat survey method and is now focusing on a agreed level of bat roost tree resource compensation. This is in discussion; the Applicant understands my position as it was clarified during our 23/04/2026 meeting</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>England licence following pre-agreed mitigation measures.</p> <p>The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>		
3.3.7	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in <b>Section 8.4 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>The Applicant has committed to a 5-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for DCO projects of this scale. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the <b>7.1 Biodiversity Net Gain Report [APP-299]</b>.</p>	<p>BMSDC provided the following comments in their relevant representation dated 27th November 2025:</p> <ul style="list-style-type: none"> <li>The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "<i>Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4))</i>", is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement.</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under further review and that BMSDC will provide further comment following consideration around reinstatement.</p> <p>BMSDC position: BMSDC should be on record has foreseeing potential failure rate issues with that length of management. Some degree of compromise might</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			be achievable if NG makes a suitable commitment to high-quality care within the 5yr management period.	
<b>EIA – Baseline Conditions</b>				
3.3.8	Baseline conditions and receptors	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in <b>Section 8.5 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• 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; BMSDC position pending.</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline conditions and receptors for bats which requires further information.</p>	Agreed
3.3.9	Baseline conditions and receptors (Bats)	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The bat roost survey scope was agreed with Natural England, as evidenced within <b>5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]</b>, as the primary statutory advisor and</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• Note also the comments made for ID 3.3.8.</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2025 that the baseline conditions and receptors for roosting bats requires further information and review.</p> <p>Place Services Ecology comments same as ID 3.3.6</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken.</p> <p>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. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> includes a reasonable worst-case assessment of impacts on potential roost features.</p> <p>The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</p> <p>The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed.</p>		

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.3.10	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant can confirm the mitigation hierarchy will be rigorously applied, avoiding impact wherever possible. An extensive change control process is used which includes changes to avoid as many sensitive ecology features as possible.</p>	<p>The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated.</p> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed
3.3.11	Standard mitigation	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The standard mitigation measures summarised in the ES section 8.6 and stated in the OCoCP are largely appropriate and anticipated as adequate if effectively implemented.</li> </ul> <p>BMSDC 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 3.3.12.</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.3.12	Standard mitigation (Bats)	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Given the transient nature of bat roosts within trees, pre-commencement surveys will ensure all bat roosts are identified prior to construction and are the best means of protecting the bats themselves and providing any compensatory roost mitigation that may be required.</p> <p>Where the presence of a roost is confirmed, mitigation measures to be agreed with Natural England would be delivered under licence to ensure no impact on the favourable conservation of bats. The Examining Authority can therefore be reassured that the requirements of The Conservation of Habitats and Species Regulations 2017 for roosting bats have been met.</p> <p>The Applicant welcomes ongoing engagement with BMSDC in relation to this matter. Should it be considered that respective positions remain unchanged</p>	<p>BMSDC provided the following comments in response to their review of the Statement of Common Ground dated 14 October 2025:</p> <ul style="list-style-type: none"> <li>• However, measure B16's assumption that any action requiring a Natural England derogation licence can be "<i>reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit</i>" is considered unsound. BMSDC 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 in relation to bats as stated for ID 3.3.14.</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for bats requires further information and review.</p> <p>Place Services Ecology Comments same as ID 3.3.6</p>	Under Discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		following further discussion, it may be appropriate to update the status of this matter.		
3.3.13	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<p>BMSDC provided the following comments in in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>See above comments regarding habitat reinstatement and protected species derogation licensing</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed

#### EIA – Assessment Conclusions

3.3.14	Construction effects	<p>The assessment of effects during construction is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The assessment of effects during construction presented.</p> <p>Tables 8.23 and 8.24 within <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> do not restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1–10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and</p>	<p>BMSDC provided the following comments in in their Relevant Representation dated 27 November 2025</p> <ul style="list-style-type: none"> <li>It would be useful transparency to advise on how long is it predicted to take for the long-term neutrality to be achieved for the affected receptors.</li> <li>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.</li> <li>BMSDC 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.</li> </ul> <p>Where static bat detector surveys within the Order</p>	Under discussion
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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated.</p> <p>The bat roost survey scope was agreed with Natural England, as evidenced within <b>5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]</b>, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken.</p> <p>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. <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> includes a reasonable worst-case assessment of impacts on potential roost features.</p> <p>The Project as currently proposed has not identified any impacts to bat roosts which would likely constitute an offence under</p>	<p>Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, <i>“the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees [any number of which could be classified PRF-M after further survey] and 16 trees with hibernation features.”</i></p> <p>As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected.</p> <ul style="list-style-type: none"> <li>The potential impact without any mitigation measures being applied is described in the ES Table 8.23: “In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative,</li> </ul>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>the legislation, with no bat roosts identified that would be lost/disturbed and therefore no current requirement for a bat licence.</p> <p>Should a bat roost be identified during pre-commencement surveys a licence would be obtained from Natural England, the same tests will therefore apply as above, and the favourable conservation status of bats will be maintained.</p> <p>The Applicant welcomes ongoing engagement with BMSDC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to update the status of this matter to 'not agreed'.</p>	<p>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 3.3.11, this is not considered to be a reasonably supported assessment.</p> <ul style="list-style-type: none"> <li>• What is being proposed is a quasi District Level Licence-type approach for roosting bats (i.e. getting DCO without first completing surveys), when BMSDC is not aware of any such DLL method for bats having been trialled and approved.</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around timeframes.</p> <p>Place Services Ecology comments same as ID 3.3.6</p>	
3.3.15	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The assessment of effects during operation (and</p>	<p>BMSDC provided the following comments in in their Relevant Representation dated 27<sup>th</sup> November 2025</p> <ul style="list-style-type: none"> <li>• The assessment of effects during operation (and maintenance) is considered appropriate.</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		maintenance) presented is considered appropriate.		
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.3.16	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction related mitigation measures specified in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and is appropriate for managing construction impacts from the Project.</p> <p>Full details of the ECoW's qualifications / experience will be provided within the final CoCP which is to be approved by the relevant local planning authority. What classifies as a suitably qualified ECoW will depend on the specific task to be undertaken and the protected species or habitat in question. Some examples of minimum standards which would be required include a minimum of 3 years relevant post-graduate experience in ecological supervision of construction works; membership (or eligibility for membership) of a relevant professional body, such as the Chartered Institute of Ecology and Environmental Management (CIEEM); and holding of any species-specific licences required to supervise works affecting legally protected species, where applicable. This role will not be undertaken by one individual, but</p>	<p>BMSDC provided the following comments in in their Relevant Representation dated 27 November 2025</p> <ul style="list-style-type: none"> <li>Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, we would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. We also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project.</li> </ul> <p>B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey class licensed (level 2+ if endoscopy required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification. B16 – see comments for ID 3.3.11.</p> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Ecological Clerk of Works.</p> <p>Place Services Ecology comments 01/05/26 - This was discussed with the Applicant on 23/04/2026. I believe there is common ground in the desire to ensure effective ECoW function during the</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>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).</p> <p>Further details on the Ecological Clerk of Works is included in the Applicants response to BIO 1.26 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>	<p>construction phase of the project. Both the Applicant and I agreed to think further on a suitable description of the necessary qualifications/experience required. Applicant mentioned a possibility that an Ecology Advisory Board could review (presumably vet) and give approval for appointed ECoWs, which seems a good proposal.</p>	
3.3.17	Outline LEMP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant operational related mitigation measures specified in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and is appropriate.</p> <p>Natural England (the statutory responsible body for bats) has approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025</p> <ul style="list-style-type: none"> <li>With respect to paragraph 6.1.8, what is the criteria used for defining a tree's bat hibernation potential? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features?</li> </ul> <p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around bat hibernation.</p> <p>Ecology comments 01/05/26 - I still don't think the Applicant is properly identifying the hibernation roost potential of trees, but again this can fall under the discussion being had concerning the compensation</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility.</p> <p>The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above.</p> <p>The Applicant welcomes ongoing engagement with BMSDC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to update the status of this matter to 'not agreed'.</p>	<p>offering for the overall bat roost tree resource impact of the project</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Other matters as required</b>				
3.3.18	Biodiversity Net Gain (BNG) - Onsite and Assessment	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects.</p> <p><b>7.1 Biodiversity Net Gain Report [APP-299]</b> sets out the approach to BNG. The Applicant has provided a response regarding BNG and planting aftercare periods in Section 3.13 'Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain' in <b>Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>BMSDC would like this matter to remain under discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.7 is resolved.</p> <p>Place Services Ecology Comments 01/05/26 Agreement with NG regarding ID 3.3.7 is still a requisite for achieving agreement on ID 3.3.18. The reinstatement planting has to be effective in achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur.</p>	Under discussion
3.3.19	Biodiversity Net Gain (BNG) - Offsite	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. <b>7.1 Biodiversity Net Gain Report [APP-299]</b> sets out the approach to BNG.</p> <p>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 <b>7.1 Biodiversity Net Gain Report [APP-299]</b>, 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</p>	<p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2025 that this matter is still under discussion, and that further clarification is sought around Offsite BNG.</p> <p>Place Services Ecology Comments - This likely needs to stay under discussion until more details of the planned off-site BNG provider(s) are revealed.</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others, including the local 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.</p> <p>Offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.</p>		
3.3.20	Arboricultural Impact Assessment (AIA)	<p>The level of detail within <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report [APP-236]</b> is based on the methodology outlined in Appendix J of <b>6.19 Scoping Report [APP-296]</b> and is considered appropriate for this stage of the Project.</p>	<p>BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2025 that this matter is still under discussion.</p>	Under discussion

## 3.4 Air Quality

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.4.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 7.2 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by National Grid</li> </ul>	Agreed
<b>EIA – Approach and Methods</b>				
3.4.2	Study area	<p>The study area was agreed through the <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Application</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> .	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant</li> </ul>	Agreed
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through the EIA <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. BMSDC provided the following position in their Relevant Representations dated 27 November 2025: <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant</li> </ul>	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> . The key parameters and assumptions presented are considered appropriate.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	
<b>EIA – Baseline Conditions</b>				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> . The baseline conditions and receptors presented are considered appropriate.	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</li> </ul>	Agreed
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <p>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</p>	Agreed
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of <b>6.7 Environmental Statement Chapter 7 -</b>	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>Air Quality [APP-147]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</p>	
3.4.9	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 7.6 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</li> </ul>	Agreed
<b>EIA – Assessment Conclusions</b>				
3.4.10	Construction effects	<p>The assessment of effects during construction is presented in Section 7.7 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>. The assessment of effects during construction presented is considered appropriate.</p>	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 7.7 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.</li> </ul>	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.4.12	Outline CoCP	<b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant mitigation measures specified in <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and is appropriate for managing construction impacts from the Project.	<p>Statutory Consultation response stated: 'Whilst dust control is addressed, we recommend the CoCP specifies the means of water suppression to be used and how this supply will be maintained particularly during periods of dry and windy weather. The supply shall be suitable and sufficient having regard to the size of the area under development.'</p> <p>Comments received on 25 February raised the following summarised points:</p> <ul style="list-style-type: none"> <li>Reviews to the dust management plan in relation to compounds</li> <li>The use of satellite locations to understand areas that generate dust.</li> </ul> <p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	
Other matters as required				

### 3.5 Noise and Vibration

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.5.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 14.2 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Significant effects are defined in Section 4 of <b>6.14 Environmental Statement</b></p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• Definition of “significant” noise to be clarified.</li> <li>• BMSDC EP Comments 01/05/26 - We would ask that this remains under discussion to ensure that we have had sight of this document and the additional details provided.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>Chapter 14 - Noise and Vibration [APP-256]</b> and are based on applicable guidance. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed</p>		
<b>EIA – Approach and Methods</b>				
3.5.2	Study area	<p>The study area was agreed through the EIA <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.5.3	Data sources	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>.</p>	<p>BMSDC noted in their Relevant Representations that this matter is agreed.</p>	Agreed
3.5.4	Assessment methodology	<p>The methodology for assessing Noise and Vibration was agreed through the EIA <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>Not agreed, as per comments on 3.5.1.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<p>The following information is in response to comments raised in November 2025:            Significant effects are defined in Section 4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and are based on applicable guidance.            The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed</p>				
<b>EIA – Baseline Conditions</b>				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>This matter was discussed with BMSDC during a topic specific meeting in December 2025. The approach to the assessment was discussed together with the identification of receptors and baseline conditions. All receptor locations are provided in the <b>ES Figure 6.14.F1 Environmental Statement Figure 14.1 – Baseline Noise Data [APP-262]</b>.</p>	<p>BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• Not agreed as all receptor locations have not been supplied.</li> <li>• BMSDC EP Comments 01/05/26 - It should be confirmed if an updated plan has been provided to detail all of the receptors and monitoring positions.</li> </ul>	Under discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant	The Noise and Vibration Management Plan should include:	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>to Noise and Vibration effects, are set out in Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><b>7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]</b> has been prepared based on a worst-case assessment. The NVMP will be further developed by the Main Works Contractor(s) once the detailed design is available.</p> <p>With regards to the specific points raised by BMSDC:</p> <ul style="list-style-type: none"> <li>• With regards to monitoring, this would be managed and undertaken by the contractor through consultation with the local authority where appropriate. In some cases monitoring may form part of the requirements for a Section 61 agreement</li> <li>• With regards to piling, the assessment assumed a worst-case percussive method may be used. Alternative methods will be used where practicable. This will be determined by the contractor following their detailed assessments, including assessment of ground conditions. No locations have</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed noise/vibration limits and justification for limits proposed</li> <li>• Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>• The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>• Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike.</li> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance with British Standard 4142 and British Standard 5228 (or any subsequent revisions).</li> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted</li> </ul> </li> </ul>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>been identified where there are likely significant adverse effects from noise and vibration from percussive piling where appropriate mitigation is incorporated in the works. Alternative methods, where appropriate would be expected to be quieter.</p> <ul style="list-style-type: none"> <li>• Noise and vibration from compounds would be assessed by the contractor, and specific mitigation measures would be identified and incorporated into the NVMP. This would include both the construction and operation of the compounds during the construction phase. The initial assessment presented in the ES did not identify any likely significant adverse effects from noise or vibration from either the construction or operation of construction compounds.</li> <li>• BS 4142 is not strictly appropriate for the assessment of noise from construction compounds, with BS 5228 taking precedence. However, the principles of BS 4142 may be incorporated into the assessment conducted by the contractor, particular for any fixed plant items.</li> <li>• The assessment would include all noise sensitive receptors within the study area, with the results compared against appropriate thresholds. BPM</li> </ul>	<p>noise/vibration impact and specific noise/vibration mitigation measures proposed.</p> <ul style="list-style-type: none"> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> <ul style="list-style-type: none"> <li>• BMSDC EP Comments 01/05/26 - Provided that the applicant is in agreement with the requirements outlined above and this is confirmed, 3:5:7 – 3:5:11 can be moved to agreed.</li> </ul>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.5.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Please see responses to ID3.5.7 above in response to the duplicate comments.</p>	<p>The Noise and Vibration Management Plan should include:</p> <ul style="list-style-type: none"> <li>Proposed noise/vibration limits and justification for limits proposed</li> <li>Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			<p>equipment may be used i.e. generators or suchlike.</p> <ul style="list-style-type: none"> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance <b>with British Standard 4142</b> and <b>British Standard 5228</b> (or any subsequent revisions).</li> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed.</li> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> </li> </ul>	
3.5.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> .	<p>The Noise and Vibration Management plan should include:</p> <ul style="list-style-type: none"> <li>• Proposed noise/vibration limits and justification for limits proposed</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Please see responses to ID3.5.7 above in response to the duplicate comments.</p>	<ul style="list-style-type: none"> <li>• Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>• The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>• Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike.</li> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance <b>with British Standard 4142</b> and <b>British Standard 5228</b> (or any subsequent revisions).</li> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed.</li> </ul> </li> </ul>	

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<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"></div> <div style="width: 45%; border-left: 1px solid black; padding-left: 10px;"> <ul style="list-style-type: none"> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> </div> <div style="width: 10%; background-color: #92d050;"></div> </div>				
<b>EIA – Assessment Conclusions</b>				
3.5.10	Construction effects	<p>The assessment of effects during construction is presented in Section 14.7 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>Please see responses to ID3.5.7 above in response to the duplicate comments.</p>	<p>The Noise and Vibration Management plan should include:</p> <ul style="list-style-type: none"> <li>• Proposed noise/vibration limits and justification for limits proposed</li> <li>• Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>• The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>• Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			<p>equipment may be used i.e. generators or suchlike.</p> <ul style="list-style-type: none"> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance <b>with British Standard 4142</b> and <b>British Standard 5228</b> (or any subsequent revisions).</li> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed.</li> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> </li> </ul>	
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 14.7 of <b>6.14 Environmental Statement Chapter 14 - Noise and</b>	<p>The Noise and Vibration Management plan should include:</p> <ul style="list-style-type: none"> <li>• Proposed noise/vibration limits and justification for limits proposed</li> </ul>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>Vibration [APP-256].</b> The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Please see responses to ID3.5.7 above in response to the duplicate comments.</p>	<ul style="list-style-type: none"> <li>• Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>• The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>• Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike.</li> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance with <b>British Standard 4142</b> and <b>British Standard 5228</b> (or any subsequent revisions).</li> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed.</li> </ul> </li> </ul>	

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<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"></div> <div style="width: 45%; border-left: 1px solid black; padding-left: 10px;"> <ul style="list-style-type: none"> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> </div> <div style="width: 10%; background-color: #92d050;"></div> </div>				
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.5.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant mitigation measures specified in <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the <b>7.2 Outline Code of Construction Practice [APP-300]</b>. A further meeting was held in January 2025 to address comments from stakeholders.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the <b>7.2 Outline Code of Construction Practice [APP-300]</b>.</p> <p>A further iteration of the <b>7.2 Outline Code of Construction Practice [APP-300]</b> was</p>	<p>Comments received from BMSDC on 25 February raised the following summarised points:</p> <ul style="list-style-type: none"> <li>• Amendments to the construction hours as to not affect nearby amenities.</li> <li>• Amendments to the construction hours as to not affect nearby amenities.</li> <li>• Inclusion of noise/vibration limits, detailed monitoring requirements, and noise and vibration monitoring in relation to compound areas.</li> </ul> <p><b>CONSTRUCTION HOURS</b></p> <ul style="list-style-type: none"> <li>• We would ask that the construction hours (including vehicle movements on site) are restricted as follows: <ul style="list-style-type: none"> <li>– 07.30 - 18.00hrs Mondays to Fridays</li> <li>– 08.00 - 13.00hrs Saturdays</li> <li>– No working and/or plant operated on Sundays and Bank Holidays.</li> </ul> </li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>issued in May 2025 following the meeting and feedback in writing.</p> <p>Construction Hours: The working hours are secured through Requirement 7 of Schedule 3 of <b>3.1 Draft DCO [REP3-004]</b>.</p> <p>The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</p> <p>The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption,</p>	<ul style="list-style-type: none"> <li>• Scheduled overruns/out of hours working are subject to COPA1974 S61 prior consent with the submission of an application detailing times of work, plant details and noise/vibration levels at least 28 days prior to commencement. This would be essential in the case of horizontal directional drilling (HDD) which is identified as being likely to require night time working to complete trenchless crossings</li> <li>• Where noise levels have been agreed with the LPA for a COPA1974 S.61 prior consent, this will provide a defence to the person undertaking the construction activities providing they remain within those levels with no exceedances. However, where levels are exceeded then Statutory Nuisance may exist under the EPA1990 S.79. The LA may take action under S.80.</li> <li>• It should be noted that an individual aggrieved may still take action under the EPA1990 S.82 or seeking an injunction.</li> <li>• Control and mitigation measures in respect of noise, vibration, dust and light are in place to reduce the likelihood of a Statutory Nuisance however they may not completely exclude the possibility of action being taken under the provisions of the Environmental Protection Act 1990.</li> <li>• We would not consider the agreement to these by the Local Planning Authority to be a reasonable and proportionate defence against future nuisance action.</li> </ul>	

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		<p>seasonal restrictions and access constraints.</p> <p>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</p> <p>A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.</p> <p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> sets out noise and vibration limits, monitoring protocols, and</p>	<p>NOISE AND VIBRATION MANAGEMENT</p> <p>The Noise and Vibration Management plan should include:</p> <ul style="list-style-type: none"> <li>• Proposed noise/vibration limits and justification for limits proposed</li> <li>• Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time.</li> <li>• The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions).</li> <li>• Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike.</li> <li>• Having regard to the length of time for which compounds may remain in situ and use, the following is required: <ul style="list-style-type: none"> <li>– A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound</li> <li>– The assessments are to be undertaken in accordance with <b>British Standard 4142</b> and</li> </ul> </li> </ul>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within <b>7.2 Outline Code of Construction Practice [REP3-025]</b> will be secured via Requirement 4(a) (Construction Management Plans) of <b>3.1 draft DCO [REP3-004]</b> within the final CoCP.</p> <p>The Applicant would also like to note that reducing working hours on a Saturday to 8:00–13:00 would not be practical as it would significantly limit the available time to carry out construction activities. The process of mobilising the workforce, setting up equipment and preparing the site for work can take a considerable amount of time at the start of each shift, likewise with demobilisation which requires adequate time to safely secure equipment and materials to ensure the site is left in a safe condition. A substantial portion of the morning would be taken up by these activities, leaving insufficient time for productive construction works.</p> <p>There are a number of instances within Requirement 7 of Schedule 3 of <b>3.1 draft DCO [REP3-004]</b> that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, the Applicant. does not consider it to</p>	<p><b>British Standard 5228</b> (or any subsequent revisions).</p> <ul style="list-style-type: none"> <li>– A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed.</li> <li>– Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration.</li> <li>– Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself.</li> <li>– Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.</li> </ul> <p><b>BMSDC EP comments 01/05/26</b> - We would reiterate our previous position as follows ask that this section remains <b>under discussion</b>.</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>be practical to notify the relevant authorities.</p> <p>The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of <b>7.2 Outline Code of Construction Practice [REP3-025]</b>, including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).</p> <p>Please see responses to ID3.5.7 above in response to the duplicate comments on noise.</p>		
<b>Other matters as required</b>				

## 3.6 Health and Wellbeing

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 10.2 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
<b>EIA – Approach and Methods</b>				
3.6.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> 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 <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> .	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.6.4	Assessment methodology		Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> . The key parameters and assumptions presented are considered appropriate.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
<b>EIA – Baseline Conditions</b>				
3.6.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The Health and Wellbeing assessment is presented in <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. The Health and Wellbeing assessment has focused on the local population. Aspects that may affect tourists specifically include impacts relating to physical activity and access to open space which have also been assessed in <b>6.10 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. Impacts on tourism and tourist facilities are assessed in <b>6.15</b></p>	<p>BMSDC provided the following position in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The baseline for Health and Wellbeing has not included the impact of the project on our non-resident population (including tourists) or specific indicators of deprivation including access to services or affordability which are particularly poor in Babergh district.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265].</b></p> <p>The Health and Wellbeing assessment in <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> has been informed by baseline data including the Index of Multiple Deprivation (IMD). The IMD comprises multiple deprivation domains, which include barriers to housing/services and income.</p>		
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.6.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.</p>	Not applicable
3.6.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and</p>	<p>Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.</p>	Not applicable

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.6.9	Additional mitigation	<p>adequate, in terms of its nature and scale, to address potential effects.</p> <p>The consideration of additional mitigation measures is presented in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable

### EIA – Assessment Conclusions

3.6.10	Construction effects	<p>The assessment of effects during construction is presented in Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>Whilst it is noted that the Council do not accept the conclusions in relation to the health and wellbeing assessment, the Applicant considers that the assessment has been undertaken in line with appropriate guidance agreed with local authorities (e.g. IEMA and WHIASU) and is a robust and proportionate assessment for a scheme of this nature, informed by best practice and professional judgment.</p> <p>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</p>	<p>BMSDC provided the following position in their relevant representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>The conclusion that effects would be not significant in relation to health and wellbeing is not accepted.</li> </ul>	Under discussion
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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.6.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	BMSDC has not confirmed their position on this matter.	Under discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.6.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant mitigation measures specified in <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> and is appropriate for managing construction impacts from the Project. A meeting was held in October 2024 to agree on the structure for the <b>7.2 Outline Code of Construction Practice [APP-300]</b>. A further meeting was held in January 2025 to address comments from stakeholders. Meeting held in March 2025 to discuss the second iteration of the <b>7.2 Outline Code of Construction Practice [APP-300]</b>. A further iteration of the <b>7.2 Outline Code of Construction Practice [APP-300]</b> was issued in May 2025 following the meeting and feedback in writing.</p>	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Other matters as required</b>				
3.6.13	EMF assessments	<p><b>7.8: Electric and Magnetic Field Compliance Report [REP3-034]</b> details the electromagnetic field (EMF) assessment for the Project, demonstrating compliance with the requirements of National Policy Statement (NPS) EN-5 in line with the requirements of the Governments Code of Practice 'Power lines: Demonstrating compliance with EMF public exposure guidelines'. This demonstrates that when directly under the overhead lines or directly above the underground cables the ICNIRP exposure limits are not exceeded. Any offset from the overhead line or cables reduced the EMF levels significantly ensuring compliance at any distance from the assets.</p> <p>No residential properties are located closer than 30 metres to the overhead line over the entire Project. At this distance, the electric and magnetic fields on the second floor of a property (3.5 metres above ground) would be 0.55 kV/m and 10.94 <math>\mu</math>T using the maximum continuous operation conditions. These are significantly below the ICNIRP exposure limits detailed in NPS EN-5. All other EMFs in residential properties along the overhead line route</p>	<p>BMSDC provided the following position in their Relevant Representations dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>• A site-specific risk assessment calculating the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels has not been submitted. This information is necessary to appropriately assess the potential for exposure to electromagnetic radiation against the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and RF EMF Guidelines 2020 limits. The levels must be when all equipment, both existing and proposed, are operating at maximum power. A valid ICNIRP certificate must also be submitted.</li> <li>• The EMF emissions should not exceed limits within the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2023), including set the ICNIRP guidelines (or any subsequent updates) and any alterations should be approved in writing in advance by the relevant authority.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		would be less than these values due to the additional distance. For underground cables, increasing the vertical distance reduces the EMFs further, so the details noted in Chapter 6, Section 6.3 of <b>7.8 Electric and Magnetic Field Report [REP3-034]</b> represent a worst case exposure situation and compliance. <b>7.8 Electric and Magnetic Field Report [REP3-034]</b> is the Applicant's formal submission of compliance with the ICNIRP limits and can be used as evidence of compliance for the entire Project.		

### 3.7 Historic Environment

3.7.1 Babergh and Mid Suffolk District Councils defer all positions regarding archaeology to Suffolk County Council, therefore Table 3.7 below only deals with Built Heritage.

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b>	[Built Heritage] Query raised with National Grid regarding Paragraph 11.4.25 on page 26 of Document 6.11 Environmental Statement Chapter 11 – Historic Environment - that the settings of all Low value non-designated heritage assets (which include locally listed buildings) have not been assessed which	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>and Section 11.2 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The Applicant notes the BMSDC 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 <b>6.19 Scoping Report [APP-288 – APP-296]</b>, <b>6.20 Scoping Opinion [APP-297]</b> and the methodology set out in Environmental Statement <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. 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</p>	<p>would not appear to be in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1).</p> <p>Based on a further review of the identification and assessment of the value of NDHA buildings in Document: <b>6.11.A1 Appendix 11.1 Historic Environment Baseline Report [APP-209]</b> we are able to agree this matter.</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.</p>		
<b>EIA – Approach and Methods</b>				
3.7.2	Study area	<p>The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	Agreed
3.7.3	Data sources (Built heritage)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>.</p> <p>Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was</p>	<p>No clear distinction has been made between built NDHAs and archaeological (below ground) NDHAs in the assessment tables. There are some references to non-designated buildings in the Baseline Report but these have not been given a reference/ID number and none appear to have been taken forward to the assessment tables (presumably as they are held to be of Low Value/Sensitivity). Clarification regarding the identification on non-designated built heritage</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. <b>6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report Figure A11.1.2 - Non-Designated Heritage Assets [REP1-064]</b> is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.</p>	<p>assets and the assessment (or not) of impacts on their significance arising from the development should be provided.</p> <p>BMSDC (Built Heritage) confirm matter is agreed.</p>	
3.7.4	Assessment methodology (Built heritage)	<p>The methodology for assessing Historic Environment was agreed through the <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p> <p>The Scoping Opinion stated: <i>“The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.”</i></p>	<p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BMSDC raised at statutory consultation that they did not agree with the value assigned to heritage assets. This related to the Value/Sensitivity assigned to Grade II listed buildings in the assessment methodology. The assignment of a Medium value to these assets is now accepted.</p> <p>BMSDC stated that they were in agreement that decommissioning effects could be scoped out. This is considered acceptable subject to the provision of a</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BMSDC raised at statutory consultation that they did not agree with the value assigned to heritage assets. However, there is precedent for the approach proposed and professional judgement is always used when assigning value to heritage assets. Therefore, as per the Scoping Opinion report, the value assigned to heritage assets will remain the same.</p> <p>It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion.</p> <p>The Applicant position regarding non-designated heritage assets is as outlined in ID3.6.1 (Policy and Legislation) above.</p>	<p>guarantee within the DCO that decommissioning of the project will require appropriate assessment.</p> <p>Email from Suffolk County Council 4th Nov 2024 - Built heritage – consultant’s methodology not agreed, and all assets affected not identified.</p> <p>The value assigned to all heritage assets in Table 11.3 of Document 6.11 Environmental Statement Chapter 11 – Historic Environment is agreed. Historic Environment Viewpoints feedback received on 3<sup>rd</sup> March 2025 from EPS on behalf of BMSDC.</p> <ul style="list-style-type: none"> <li>• It appears that the only NDHAs included in Annex A are those that appear on the relevant Historic Environment Record. This is concerning as not all built NDHAs will be included on the HER. Unfortunately, no text has been provided which addresses various comments and questions previously raised regarding whether there was a methodology for identifying NDHAs as part of site walkovers, whether this has been undertaken, or whether any have been identified.</li> <li>• As such, there are still concerns that not all NDHAs have been included (EPS on behalf of BMSDC – Built Heritage, June 2025). Please see latest comments above.</li> <li>• A ‘spot check’ of the Draft Heritage Baseline Report was carried out by EPS on behalf of BMSDC which raised questions and concerns regarding the robustness of the methodology. These comments were submitted to NG in a letter dated 6<sup>th</sup> March 2025 (EPS on behalf of BMSDC – Built Heritage, June 2025)</li> </ul> <p>BMSDC confirm this matter is now agreed following review of the ES.</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.7.5	Key parameters and assumptions (Built heritage)	<p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>In March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.</p>	<p>Please see comments regarding non-designated buildings (NDHAs) above at ID3.7.3. ECC (Built Heritage) is in agreement with the matter following review of the ES.</p>	Agreed
<b>EIA – Baseline Conditions</b>				
3.7.6	Baseline conditions and receptors (Built heritage)	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. The baseline conditions and receptors presented are considered appropriate.</p>	<p>A spot check of the Baseline report suggests it is mostly considered appropriate subject to clarification regarding built NDHAs. BMSDC (Built Heritage) confirm matter is now agreed.</p>	Agreed
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.7.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The embedded and mitigation measures are acceptable in principle, however, the residual effects of the proposals at both Construction and Operation and Management phases of the project include a Mid level of less than substantial harm to the significance of some designated heritage assets. Following our review and assessment of NG's conclusions on the impacts of the project on heritage assets, for each designated heritage asset where a Mid Level of less than substantial harm has been identified to its</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>5.15 Design Development Report [APP-122]</b> provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted consultations held in 2025. <b>5.15 Design Development Report [APP-122]</b> addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.</p>	<p>significance at the Operation and Maintenance phase of the project we would request further details are provided by the Applicant regarding the embedded mitigation measures that have been employed, for example, the selected overhead line routes and pylon locations and whether or what, if any, alternatives were assessed prior to the submitted project design. Further time is needed to review <b>5.15 Design Development Report [APP-122]</b> but we note this refers only to changes requested to the route alignment which were made before the final ES.</p>	
3.7.8	Standard mitigation (Built heritage)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>We recommend that standard mitigation measure H06 is further expanded to clarify the definitions of 'appropriate' replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals of fences, walls, etc.</p> <p>We also recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>. Specifically, this means: Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature.</p> <p>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists.</p> <p>Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible</p> <p>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.</p>	<p>vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects.</p> <p>Update to comments 1/5/26:</p> <p>Regarding H06, the applicant's explanation of 'appropriate' in this context is acceptable, however, Section 9 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> makes no specific reference to the historic environment or reference to historic environment records. The commitment set out here by the applicant in the SoCG (highlighted yellow opposite) should be captured in <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> or another suitable document, with specific reference to heritage assets.</p> <p>Regarding H07, whilst we understand the calculated potential for adverse effects from construction vibration extends only to the listed Little Bromley War Memorial, we remain of the view that there should be a mechanism for reporting and investigating any concerns about the impact of construction effects by building owners and residents.</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>Regarding H07 <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> did not identify any heritage assets in BMSDC that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate.</p>		
3.7.9	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 11.6 of <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>We understand that no additional mitigation is proposed. It is agreed that in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest. EPS on behalf of BMSDC noted during call in January 2026 that this matter is not relevant for Built Heritage.</p>	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.7.10	Construction effects (Built heritage)	<p>The assessment of effects during construction is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. The assessment of effects during construction presented is considered appropriate.</p>	<p>Email 4 Nov 2024 - Archaeology – consultants not assessing significant areas of 132kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. BMSDC (Built Heritage) confirm that this matter is agreed.</p>	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.7.11	Operational (and maintenance) effects (Built heritage)	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Regarding Hall Farm House (1181726) and Barn About 30 m West of Hall Farm House (1032806) – At their nearest, pylons would be c. 900 m north-west of the assets. Between pylon RG108 (1.5 km west-south-west of the assets) and pylon RG102 (1 km north of the assets), the Project would replace an existing run of smaller pylons (PKF16 –24). At a distance of almost 1 km the assessment concluded that the slight difference in height would not be noticeable. Also, the greater span of the new pylons means that two fewer pylons would be required, reducing impact further. The Project, therefore, considers the assessment of harm as presented in <b>6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]</b> for these assets to be appropriate.</p>	<p>For Section B, based on a desk based review of the NG assessments for the Scheduled Monument, the Conservation Areas and the Grade I and Grade II* listed buildings and some nearby Grade II listed buildings, the assessments of harm to significance are mostly agreed.</p> <p>Grade II listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806) are located on the northern edge of the Mellis Conservation Area and as such we would disagree with the assessment of no harm to their significance during the Operational phase of the project. We would suggest there will be a Low level of less than substantial harm to the significance of these buildings due to the change to their setting, in line with the effects on the Conservation Area.</p> <p>In Section C, based on a desk-based review of the NG assessments for the Scheduled Monument, the Conservation Area, the Grade I and Grade II* listed buildings and some nearby Grade II listed buildings, the assessments of harm to significance are agreed.</p> <p>Update 1/5/26: This topic remains under discussion in light of questions raised by IPs and the ExA which were discussed at ISH 2 Landscape and Heritage on Wednesday 29 April 2026 regarding the Limits of Deviation (LoD) in the DCO, and the action arising to agree further viewpoint visualisations to demonstrate the potential impacts of the LoD on the setting of designated heritage assets.</p> <p>Further consideration will be given to the applicant's response regarding their assessments of impact for Grade II listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806).</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.7.12	Outline CoCP	<p><b>7.4 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction mitigation measures specified in <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the Outline CoCP <b>[APP-300]</b>. A further meeting was held in January 2025 to address comments from stakeholders.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP <b>[APP-300]</b>.</p> <p>A further iteration of the Outline CoCP <b>[APP-300]</b> was issued in May 2025 following the meeting and feedback in writing.</p>	<p>In document <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> NG have identified the potential for damage to a total of five buildings or structures due to construction vibration from potential compaction activities. Four of these are located in Section C but none of which are in Babergh District.</p> <p>No structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.</p>	Under discussion
<b>Other matters as required</b>				

### 3.8 Landscape and Visual

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid’s Position	Babergh and Mid Suffolk District Councils’ Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.8.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 13.2 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The Applicant approach to the duty to seek to further the purposes of the National Landscape is set out in <b>5.10 National Landscapes – Duty to Seek to Further the Purpose Report (s85 Countryside and Rights of Way Act 2000) [APP-120]</b> which includes reference to and consideration of the Defra guidance note.</p>	<p>Reference is also needed to the DEFRA guidance note (2024) in relation to the enhanced duty for National Landscapes under LURA (2023). Likely material.</p> <p><a href="https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes">https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes</a></p> <p>Add reference to Overarching National Policy Statement for Energy (EN-1) Para 4.3.4 in relation to compensation for significant negative impacts ‘<i>To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy</i>’:</p> <p>Still no specific reference to these in policy section of LVIA.</p> <p>The proposals do not comply with EN-1 paragraph 4.3.4, which requires applicants to demonstrate how significant negative effects are avoided, reduced, mitigated, or compensated. No compensation is offered for residual adverse landscape and visual effects.</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.	
<b>EIA – Approach and Methods</b>				
3.8.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> .	Generally, we do not have issues with the study area, however, in relation to the visual assessment we feel there are opportunities outside the study area, where viewpoint assessments and visualisations could be taken to demonstrate 'no significant effect' that would aid understanding.  Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.	Under discussion
3.8.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> .  The Applicant has responded to the point about mapping in Table 4.20, ID 13.108 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> .	BMSDC remain unhappy with the number of viewpoint assessments proposed (Email November 2024).  Whilst we welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value assessment (Email 22.04.2025).  Generally, BMSDC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, BMSDC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance. BMSDC welcome that all criteria in relation to sensitivity, value and significance for instance, have now been identified and presented in the ES, we retain issue with the approach to landscape value and value of the view and disagree with some of the judgements made.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			<p>There remain a number of additional areas where we believe data quality and presentation could be improved in order to aid interpretation., including providing an Increased scale of visual receptor maps e.g., a 1:10,000 baseline as used for the Proposed Project Design Maps, and labelling by route section and/or district of the wireline visualisations. We welcome the changes made on the other data issues.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	
3.8.4	Assessment methodology (including LVIA methodology and viewpoints)	<p>The assessment methodology is set out in <b>6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]</b>.</p> <p>The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]</b>. Visualisations are provided in <b>7.12 Visualisations [APP-343 to APP-351]</b>.</p> <p>The Applicant's approach to viewpoint selection is set out in Table 4.20, ID Annex C, 1.14 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p> <p>The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>BMSDC remain unhappy with the number of viewpoint assessments proposed. (Email November 2024).</p> <p>Whilst we welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025).</p> <p>We also have reservations regarding the methodology for assessing the value of views as this is heavily skewed towards published data.</p> <p>In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, we retain concerns in select individual areas where there remain gaps in the coverage. In relation to valued landscapes see response at 3.8.3 above. We also have reservations regarding the methodology for assessing the value of views as this is heavily skewed towards published data. We retain concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 'Outside nationally</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>The Applicant has clarified the approach to identifying the value of views in Table 4.20, ID 13.105 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>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.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	
3.8.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in paragraph 13.4.20 in Section 13.4 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>The preliminary key parameters and assumptions are presented at 13.5 in relation to LVIA. It is understood '<i>This information is iterative and will be updated for the ES as the design evolves and relevant changes are accounted for in the assessment</i>'. To be reviewed.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	Under discussion
<b>EIA – Baseline Conditions</b>				
3.8.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The Applicant's approach to viewpoint selection is set out in Table 4.20, ID Annex</p>	<p>BMSDC remain unhappy with the number of viewpoint assessments proposed. (Email November 2024).</p> <p>Whilst BSMDC welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025).</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>C, 1.14 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. The Applicant has clarified the approach to identifying the value of views in Table 4.20, ID 13.105 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>We also have reservations regarding the methodology for assessing the value of views as this is heavily skewed towards published data. An approach to compensation is needed, not just mitigation, where and how it has been identified and described, how the applicant has sought engagement from the local authority on this issue etc. (See below) We retain these concerns Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.8.7	Embedded mitigation	<p>Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b> and also paragraphs 13.6.2 to 13.6.4 in Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. Embedded mitigation is considered appropriate in terms of its nature and scale, to address potential effects. The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10.</p>	<p>Statutory consultation response stated that 'In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding is required to protect valued local landscapes, long-distant rights of way and rural amenity sites.' We retain these concerns. BMSDC do not agree on the response as to why there no further undergrounding is proposed e.g. in the Gipping Valley which has the qualities of a Special Landscape Area. We do not see how this conclusion can be made in advance of a valued landscape assessment being carried out and shared with us. Local landscape designation has not been national policy for decades. The Holford Rules are out of date on this issue and haven't been reviewed since the 1990s when landscape characterisation became the tool for understanding landscape and guidance from</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> matter.</p>	<p>the 2000s on valued landscape assessment outside designated landscapes was introduced.</p> <p>We welcome the inclusion of landscape value criteria as part of the LVIA. We retain concerns that this is not a full valued landscape assessment and that it hasn't informed route selection or the drafting of the order limits, also that judgments appear to be made at a local character type level rather than on the route corridor itself.</p> <p>Even if, as stated, '<i>policy statement EN-5 (which covers the development of new energy infrastructure) ... concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid</i>' it doesn't follow that there are no significant residual negative effects and therefore that potentially further undergrounding or compensation '<i>as far as possible</i>' might be required.</p> <p>Where undergrounding isn't proposed, explanation is needed as to why compensation isn't being offered instead, except at substations and sealing end compounds, when the PEIR states that significant landscape and visual impacts will occur along the length of the project length.</p> <p>The ES confirms that significant landscape and visual impacts will occur along the length of the project length, so we retain deep concerns that further mitigation and compensation area needed</p> <p>Embedded mitigation measures are not addressing substantial significant negative residual impacts.</p> <p>As above, an approach to compensation is required.</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.8.8	Standard mitigation	<p>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.</p> <p>Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and the <b>7.2 Outline Code of Construction Practice [REP3-014]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>We have been calling for engagement on this issue since 2023.</p> <p>We retain concerns that engagement has not been initiated on appropriate and strategic landscape and visual compensation.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	Under discussion
3.8.9	Additional mitigation	<p>Additional mitigation comprises measures over and above any embedded and standard mitigation measures.</p> <p>The consideration of additional mitigation measures is presented in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p>	<p>Additional mitigation measures are not addressing substantial significant negative residual impacts.</p> <p>BMSDC do not agree that the mitigation hierarchy has been effectively applied as it does not include compensation for the negative impacts of the overhead lines and pylons.</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10.</p> <p>The Applicant awaits further correspondence, and will continue to engage with BMSDC on this matter.</p>	<p>An approach to compensation is required, where and how it will be identified and described, how the applicant will engage on this topic with the local authority. We do not consider the applicants have considered or met either the EIA Regs or EN-1 requirements in relation to compensation. It appears the likely significant negative landscape and visual effects of the project are generally not to be compensated for.</p> <p>We suggest the test of 'as far as possible' has not been met in any reasonable way in relation to the overwhelming likely permanent negative landscape and visual impacts along the length of the project described by the applicant within the PEIR.</p> <p>BMSDC retain concerns that engagement has not been initiated on appropriate and strategic landscape and visual compensation.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	

### EIA – Assessment Conclusions

3.8.10	Construction effects	<p>The assessment of effects during construction is presented in Section 13.7 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>Potential tree and hedgerow loss along the route has not been meaningfully quantified in landscape and visual terms in the assessment.</p> <p>BMSDC identified:</p> <ul style="list-style-type: none"> <li>Numerous instances where we judge the extent of significant impacts on landscape character and receptors would be greater than identified in the ES. In particular there are concerns about the approach to landscape value and susceptibility, and value of the view, and the effect this has had on some of the judgements made. In relation to</li> </ul>	Under discussion
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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>The Applicant has clarified the approach to identifying the value of views in Table 4.20, ID 13.105 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p> <p>With regard to vegetation loss, the assessment is based on the vegetation clearance assumptions set out in <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b> and presented on the <b>2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]</b>. The Applicant can confirm that tree and hedgerow loss has been assessed as part of the assessment of effects on landscape character during construction and operation. This has also been captured within the Arboricultural Impact Assessment and Biodiversity Net Gain assessment.</p>	<p>visual impact, we understand that the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result.</p> <ul style="list-style-type: none"> <li>Suggested changes to siting, alignment, viewpoint assessments and visualisations that have not necessarily been addressed. BMSDC have concerns in relation to changes to siting, alignment, viewpoint assessments and visualisations that have not necessarily been addressed. We also have concerns related to the extent of cumulative landscape and visual impacts on successive sections of the project, including at the periphery of the study area, has been properly considered</li> <li>Instances where we judge the operational impacts would be wider than stated in the ES. (see 3.8.11)</li> </ul> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	
3.8.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 13.7 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>The Applicant has clarified the approach to identifying landscape value in Table 4.20,</p>	<p>BMSDC retain concerns with the issues as identified in 3.8.10 particularly regarding how the approach to landscape value and susceptibility, and value of the view might have impacted on some of the judgements made.</p> <p>Our position is that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing or other significant mitigation is required, particularly in river valleys, to protect valued local</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>ID 13.93 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. The Applicant has clarified the approach to identifying the value of views in Table 4.20, ID 13.105 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>landscapes, long-distant rights of way and rural amenity sites.</p> <p>The ES acknowledges there will be a significant negative landscape and visual impact at both construction and operational stages over the length of the Project. And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this. The issues in relation to this remain substantially unaddressed.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.8.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction related mitigation measures specified in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October 2024 to agree on the structure for the Outline CoCP. A further meeting was held in January 2025 to address comments from stakeholders.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>The content of the CoCP is still under discussion.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.8.13	Outline LEMP	<p><b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> includes all relevant operational related mitigation measures specified in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and is appropriate.</p> <p>Meeting held on 9 October to agree on the structure for the Outline LEMP. A further meeting was held on 29 January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p> <p>A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>The content and structure of the oLEMP is still under discussion as highlighted in emails sent on October 22 2024 and 28 January 2024.</p> <p>BMSDC retain major issues with the LEMP, particularly in relation to definition, scope and scale of the term 'compensation'.</p> <p>Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.</p>	Under discussion

Other matters as required

### 3.9 Socio-economics, Recreation and Tourism

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.9.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Socioeconomics, Recreation and Tourism assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning [APP-126]</b> and Section 15.2 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p> <p>The following information is in response to comments raised in December 2025:</p> <ul style="list-style-type: none"> <li>The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job demand of approximately 480 roles over the four year construction period. Notwithstanding this, the Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a</li> </ul>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground</p> <ul style="list-style-type: none"> <li>As noted in previous responses, no Economic Strategies, Tourism/Visitor Economy Strategies, Skills plans or needs analysis have been reviewed as part of the assessment of regional and local policy, only Local Plans. This potentially skews the understanding of the existing economy and therefore the potential impact from this development.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>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. A review of the Babergh &amp; Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy has been undertaken and broadly align with the Local Plan. It is considered that the Babergh &amp; Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy would not result in material changes to the conclusions of the Socio-economics, Recreation and Tourism assessment.</p>		

### EIA – Approach and Methods

3.9.2	Study area	<p>The <b>6.20 Scoping Opinion [APP-297]</b> stated: <i>“The Applicant should seek to agree the study area with the relevant local authorities”</i>.</p> <p>A meeting was held in November 2024 to seek to agree this point in the <b>6.20 Scoping Opinion [APP-297]</b>.</p> <p>BMSDC stated in their statutory consultation response: <i>“It is welcomed that the Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has</i></p>	<p>BMSDC stated in their statutory consultation response: <i>“It is welcomed that the Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has been any direct engagement with these councils to understand their position in relation to the potential impact of this proposal.”</i></p> <p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>• BMSDC recognise that the Local Study Area has been expanded to a 3km radius as</li> </ul>	Under discussion
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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><i>been any direct engagement with these councils to understand their position in relation to the potential impact of this proposal.”</i></p> <p>The 3<sup>rd</sup> Technical Note was issued in March 2025 to seek agreement on the study area and methodology.</p> <p>The following information is in response to comments raised in December 2025:</p> <ul style="list-style-type: none"> <li>• Section 42 consultation documents were provided to Norwich City Council, West Suffolk Council and Ipswich Borough Council during pre-application following the completion of the Preliminary Environmental Information Report (PEIR).</li> <li>• Direct engagement with Norwich City Council, West Suffolk Council and Ipswich Borough Council has been undertaken pre-application during the preparation of the Environmental Statement (ES) in March 2025.</li> <li>• West Suffolk Council confirmed that they have no comment to make on the Project.</li> <li>• Norwich City Council has not responded to the request for engagement and Ipswich Borough Council has not provided a response following, requesting the technical note.</li> </ul>	<p>opposed to the 500m radius initially proposed. This is welcomed, but the Councils believe that this is still unacceptable as this is only relevant when assessing visual impact, not wider impacts to businesses or communities from the development. Access to facilities during construction is likely to be felt on a much wider radius than just within the order limits, even the 3km study area isn't likely to be wide enough to have adequately captured the businesses who would be affected. If the venue isn't within the order limits, but its access, customers or suppliers are, or vice versa, this should still be considered when assessing potential impact or if the construction of the haul road necessitates a larger diversion. A variable approach to this local study area boundary could be considered to identify issues across a wider geography that are relevant during the construction phase, but not during operations and vice versa.</p>	

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		<ul style="list-style-type: none"> <li>Direct access to businesses and community facilities has been considered within the Socio-economics, Recreation and Tourism assessment. The Applicant recognises that there may be indirect economic implications for individual businesses, including potential effects on business supply chains. However, in order to maintain a proportionate assessment, the focus remains on those impacts that are likely to be significant. Potential perceived impacts arising from the visibility of the Project are noted within the <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b> (see Table 15.22: Potential residual construction effect on built and other assets and Table 15.28: Residual operation (and maintenance) effect on built and other assets). However, these financial matters fall outside the scope of the Environmental Impact Assessment (EIA) and will be addressed separately through direct engagement with landowners.</li> </ul>		
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of <b>6.15 Environmental Statement Chapter 15 -</b>	Statutory consultation response: <i>“A range of the data in the ES is not broken down by District. There is a huge variation in this data across the region and it would be preferable if this data wasn’t amalgamated in this way.”</i>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p><b>Socio-economics Recreation and Tourism [APP-265].</b></p> <p>In response to the statutory consultation response: baseline data on employment and economic activity have been gathered for the Socio-economics, Recreation and Tourism PEIR assessment. This will also be undertaken for ES stage. However, for the purpose of local economy and employment assessment, one dataset is required for the Wider Study Area in order to maintain a proportionate assessment. The following information is in response to comments raised in November 2025:</p> <p>Background data of each district forms the Wider Study Area baseline data report in the <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b>, Table 15.9: People in employment by major occupational group, and Table 15.10: Skills and qualifications held by working aged people (16-64) within the Wider Study Area.</p> <ul style="list-style-type: none"> <li>The applicant acknowledges the data provided by Ipswich Borough Council. The accommodation bedspace uses the occupancy of approximately 83% on average across serviced and non-serviced accommodation. This is higher than the percentage presented in the response (i.e. 68% and 74%).</li> </ul>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>Through use of the VisitBritain hotel occupancy survey from 2016, the number of bedspaces has been inflated and occupancy details have been under-represented. Based on an Ipswich Borough Council commission in 2018, the Ipswich Urban area average occupancy for hotels was 68%; and the average for Suffolk Coastal District was 74%. This section also does not take into account challenges post Covid with changes in behaviour, reduction in hotel/self-catering units or issues relating to cumulative demands on accommodation from other NSIPs including Sizewell and offshore wind alongside other major local developments. VisitBritain data on self-catering occupancy is available, but has not been used –<a href="https://www.visitbritain.org/research-insights/uk-short-term-rentals">https://www.visitbritain.org/research-insights/uk-short-term-rentals</a>.</li> <li>Deprivation and wider data - An updated IMD has been released and should be used within this section.</li> <li>All data should be reviewed to ensure that it is as accurate as possible and using the most up-to-date information e.g. Economic Activity data is available for 2025 and the 2024 Volume &amp; Value data is available for the value of tourism to the economy.</li> </ul>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>Hence, considered robust to form the accommodation bedspace assessment.</p> <ul style="list-style-type: none"> <li>The assessment recognises that the Covid-19 pandemic has influenced behaviour and the hospitality sector. To ensure accuracy and relevance, our analysis relies on the latest available official data sources to ensure that our findings and recommendations are evidence-based.</li> </ul> <p>Self-catering occupancy bedspaces are captured under the 'non-serviced accommodation'.</p>	<ul style="list-style-type: none"> <li>There is an absence of reference to several key documents and sources of data that will enhance the provided socio-economic assessment. These include the Economic Strategy for Norfolk and Suffolk and the Technical Legacy Report for Norfolk and Suffolk and the Culture, Heritage and Visitor Economy Strategy for Babergh &amp; Mid Suffolk.</li> </ul>	
3.9.4	Assessment methodology	<p>The <b>6.20 Scoping Opinion [APP-297]</b> stated: <i>"The Applicant should seek to agree the study area with the relevant local authorities"</i> and <i>"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities"</i>.</p> <p>A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion.</p> <p>The following information is in response to comments raised in November 2025:</p> <ul style="list-style-type: none"> <li>The level of the sensitivity matrix has been guided by various EIA guidance. We have also included other criteria in assessing the sensitivity of business,</li> </ul>	<p>BMSDC comments raised on 17<sup>th</sup> November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>The assessment criteria that have been shared as part of the ES are believed to be flawed. The proposed development is primarily crossing a very rural area, very few of the major attractions across Suffolk have over 100,000 visitors a year. Likewise, there are a very small number of businesses which are of national or international importance, but the majority of businesses are of regional significance, therefore by definition, they are all excluded from the "high sensitivity" assessment. It is still recommended that this threshold is reconsidered and a different approach to assessing impact is proposed to</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>recreation and tourism assets. Hence, multiple factors have been considered instead of being solely based on visitor numbers. These also include if the receptor is the only service in the local area/region or if other services are available. A baseline assessment for each receptor has been undertaken and presented in the ES chapter.</p> <ul style="list-style-type: none"> <li>• The potential duration of impacts have been set out in the ES, noting the potential for short-term, medium-term and longer-term construction effect.</li> <li>• We recognise that employment sectors differ in their proportionality and local importance across areas such as Mid Suffolk, Thurrock, and Basildon. Baseline data for each LPA has been gathered. To ensure consistency, a standard approach is applied across the Wider Study Area within the assessment.</li> </ul>	<p>better reflect the local market which is more realistic and doesn't set sensitivity levels so high as to unnecessarily exclude the majority of businesses. A baseline assessment also needs to be completed to understand current operating arrangements to ensure that the impact of development on the business can be mitigated.</p> <ul style="list-style-type: none"> <li>• We also require further clarification on the definitions of "moderate" impact or "small" impact as this is open to interpretation and will vary depending on the size of business impacted.</li> <li>• The assessment criteria are also skewed and unlikely to be relevant for most accommodation providers, irrespective of the scale of impact, as most accommodation providers, with the exception of very large hotels or campsites, will have substantially less than 10,000 guests a year. The assessment criteria also do not take into account the length of time that the business faces disruption and how frequently.</li> </ul> <p>The criteria within the assessment of impact doesn't take into account significant regional variations in employment patterns – the employment sectors within Mid Suffolk in terms of proportionality and local importance will not be the same as those within Thurrock or Basildon and shouldn't be cumulatively assessed before deciding if the impact is severe enough.</p>	

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3.9.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>The following information is in response to comments raised in November 2025:</p> <ul style="list-style-type: none"> <li>• Cumulative effects are set out in a separate ES chapter, under <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. Sizewell C is located over 30km from the Order Limits. Due to the extensive distance from the Project, it was not considered in the inter-project cumulative effects assessment.</li> </ul>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>• The assumptions made within this section need to be reassessed based on cumulative impact from multiple NSIPs operating within the same time frame, particularly Sizewell, as this will impact on the workforce and accommodation available for non-local workers.</li> </ul>	Under discussion
<b>EIA – Baseline Conditions</b>				
3.9.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The following information is in response to comments raised in November 2025:</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>• Deprivation and wider data - An updated IMD has been released and should be used within this section.</li> <li>• All data should be reviewed to ensure that it is as accurate as possible and using the most up-to-date information e.g. Economic Activity data</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<ul style="list-style-type: none"> <li>Baseline information for the assessment has been gathered using the most recent and reputable publicly available sources at the time of writing. Please note that any data published after the submission of the Development Consent Order (DCO) will not be reflected in the Environmental Statement, due to timing constraints.</li> </ul>	<p>is available for 2025 and the 2024 Volume &amp; Value data is available for the value of tourism to the economy.</p>	
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.9.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>BMSDC acknowledge the proposed embedded mitigation measures including underground cabling across the Dedham Vale National Landscape and avoidance of community facilities, businesses, tourism or recreational assets where possible across the route corridor.</li> </ul>	Agreed
3.9.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. The standard mitigation is</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>The standard mitigation is noted, however, it is not believed to be sufficient to mitigate the impact on businesses and communities from this development.</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The following information is in response to comments raised in November:</p> <ul style="list-style-type: none"> <li>The assessments on community safety in regard to traffic, access to social infrastructure, and access to jobs are set out in Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>There is no recognition or acknowledgement or mitigation proposed to address the incidental impacts of construction on communities and travel to work, education, healthcare or provision of services. The development is proposed in a rural area with limited routes for public transport, and potentially lengthy diversion routes if any of these main routes are impacted during construction, therefore, the impact on the affected communities could be significant.</li> </ul>	
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 15.6 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>No additional mitigation has been proposed to address impacts within Babergh or Mid Suffolk.</li> </ul>	Agreed
<b>EIA – Assessment Conclusions</b>				
3.9.10	Construction effects	<p>The assessment of effects during construction is presented in Section 15.7 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>The following information is in response to comments raised in November 2025:</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>The ES notes potential for supply chain benefits but lacks a scenario-based assessment of local procurement opportunities.</li> <li>The Council's guidance requires promoters to distinguish hyper-local (district), local (county), and regional (East of England) supply chain opportunities, and to assess them under</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<ul style="list-style-type: none"> <li>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 or largescale regeneration schemes.</li> <li>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: <ul style="list-style-type: none"> <li>Working with local suppliers and supporting forums, such as Chambers of Commerce</li> <li>Contributing to a coordinated regional approach to electricity industry jobs and skills planning</li> </ul> </li> </ul>	<p>low/medium/high engagement scenarios. This has not been undertaken. Without such modelling, there is no robust estimate of indirect or induced employment or Gross Value Added ("GVA"). There is also insufficient recognition of potential negative effects, including wage inflation, diversion of capacity from SMEs, and supply chain saturation due to overlapping NSIPs.</p> <ul style="list-style-type: none"> <li>The assumption at this stage that the contracts will be let to "specialist contractors who may not be based within the local area" implies that local contractors who may be of a scale to bid for these contracts are not being actively encouraged to is unacceptable. Every effort should be made to ensure that all opportunities are made available to contractors and support provided to ensure open access to all for these contracts.</li> </ul> <p>The ES recognises construction workforce needs but does not provide the granular modelling by project phase (civils, mechanical and electrical, commissioning) that the Council's Supplementary Guidance requires. This omission prevents accurate alignment with local training pipelines. The Applicant assumes that only 10% of the construction workforce will be drawn from the Wider Study Area. This risks underestimating local labour capacity and opportunity, while also failing to model displacement effects from other NSIPs (Sizewell C, Sea Link, North Falls, Five Estuaries).</p>	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<ul style="list-style-type: none"> <li>– Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.</li> <li>• 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</li> <li>• As stated in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>, paragraph 15.7.7, at this stage of project development, the level of information required to undertake a detailed scenario-based assessment of local procurement opportunities is not yet available. This information will be available as the project progresses and further procurement information becomes available.</li> <li>• All baseline data gathered as part of <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b> has been broken down to District / Borough Council level, including data on occupational group (Table 15.9:</li> </ul>		

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		<p>People in employment by major occupational group), skills (Table 15.10: Skills and qualifications held by working aged people (16-64)), and industrial group (Table 15.11: Employment by broad industrial group). Data at this level is considered appropriate and proportionate for an assessment of this nature and enables assessment of impacts on the local economy and employment. This approach is based on professional judgement, engagement with Local Planning Authorities and knowledge of previous similar projects, including the Bramford to Twinstead Reinforcement.</p> <ul style="list-style-type: none"> <li>• The Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. 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</li> </ul>		

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3.9.11	Operational (and maintenance) effects	<p>than through a statutory planning condition or Requirement.</p> <ul style="list-style-type: none"> <li>The example of the potential local construction workforce required is set out in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>, paragraph 15.7.13.</li> <li>The level of job uptake will be skills level dependent, as well as taking into account suitability. Therefore, the Project is not able to confirm at this stage on the size and diversity of the labour market.</li> <li>At this stage, the 10% assumption reflects currently available data for similar projects undertaken by the applicant. This is intended as a conservative estimate given uncertainties in detailed workforce mobilisation plans, supply chain commitments, and the timing and overlap of other major infrastructure projects in the area.</li> </ul> <p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The assessment of effects</p>	<p>BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground:</p> <ul style="list-style-type: none"> <li>Following some challenges with the quality of data that NGET included within the draft Environmental Statement (ES), we are concerned that the final submission does not</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		<p>during operation (and maintenance) presented is considered appropriate.</p> <ul style="list-style-type: none"> <li>• Receptors local within the Order Limits (i.e. local study area) are set out in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. For example, Dedham Vale National Landscape is set out in the ES chapter.</li> <li>• Whilst receptors located within a 3 km buffer from the Order Limits (i.e. 3 km study area) are set out in <b>ES Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-226]</b>. For example, the Bressingham Steam Museum &amp; Gardens are set out in the ES Appendix 15.1.</li> <li>• Through routeing, siting and detailed design, the applicant has sought to reduce, as far as practicable, potential impacts on visitor attractions.</li> <li>• The Applicant recognises, however, that there could be indirect economic effects to individual businesses. These potential perceived effects due to the visibility of the Project are noted in <b>ES 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>, but would be subject to separate</li> </ul>	<p>rectify this error. Suffolk offers a rich and varied tourist offer known for its heritage assets, landscape designations and promoted areas, such as, two designated AONBs, the Dedham Vale, Stour Valley, Waveney Valley and Suffolk's Wool Towns. NGET needs to fully assess the direct and indirect impacts of this project and its associated infrastructure on all of these known features and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for recreational activity. The proposed route will also impact known visitor attractions such as Bressingham Steam and Gardens, Needham Lake, Hintlesham Hall, RSPB Wolves Wood, and these sites have not been picked up within the 3km radius for the local study area. More broadly, it is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during the construction period.</p> <ul style="list-style-type: none"> <li>• The Councils anticipate that the proposed development, given its location across the Dedham Vale AONB and the Stour Valley project area could have significant impacts upon visitor perception and ultimately visitor numbers, both during construction and during operation. This will be exacerbated due to the combination of other projects happening simultaneously in the area, hence the reason for requesting that all NSIPs are considered on</li> </ul>	

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<p>landowner discussions and compensation arrangements.</p> <ul style="list-style-type: none"> <li>A number of mitigations will be in place to manage potential impacts during construction. These include but not limited to the <b>7.3 Outline Construction Traffic Management Plan [REP3-028]</b>, <b>7.6 Outline Public Rights of Way Management Plan [APP-329]</b>, and <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. Cumulative effects are set out in <b>6.17 ES Chapter 17 - Cumulative Effects [APP-281]</b>.</li> </ul>				
<p><b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b></p>				
3.9.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction related mitigation measures specified in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b> and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October to agree on the structure for the Outline CoCP <b>[APP-300]</b>. A further meeting was held in January 2025 to address comments from stakeholders.</p>	<p>No comments received on the structure of the Outline CoCP (1st and 2nd Iterations) at the time of writing. It is therefore assumed that the structure of the CoCP is agreed.</p> <p>BMSDC confirmed in their comments on Statement of Common Ground provided in November 2025 that the content of the CoCP is still under discussion.</p>	Under discussion

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		<p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p>		
<b>Other matters as required</b>				

### 3.10 Cumulative Effects

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.10.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 17.2 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>EIA – Approach and Methods</b>				
3.10.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> .	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion
3.10.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . The key parameters and assumptions presented are considered appropriate.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion
<b>EIA – Baseline Conditions</b>				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within	No comments raised in the BMSDC relevant representations or through review of the	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		the environmental topic chapters <b>Chapters 6 – 16</b> of the <b>Environmental Statement [APP-138 to APP-280]</b> . The baseline conditions and receptors presented are considered appropriate.	Statement of Common Ground for this area around Cumulative Effects.	
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.10.7	Embedded mitigation	The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters <b>Chapters 6 – 16</b> of the <b>Environmental Statement [APP-138 to APP-280]</b> . Embedded mitigation measures, designed as an inherent part of the Project are set out in the environmental topic chapters of the <b>ES</b> . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion
3.10.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters <b>6 – 16</b> of the <b>Environmental Statement [APP-138 to APP-280]</b> . Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters and set out in <b>7.2 Outline Code of Construction</b>	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.10.9	Additional mitigation	<p><b>Practice [REP3-025]</b> The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The consideration of additional mitigation measures is presented in Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.10.10	Construction effects	<p>The assessment of effects during construction is presented in Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. The assessment of effects during construction presented is considered appropriate.</p>	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion
3.10.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.10.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction related mitigation measures specified in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects) [APP-281]</b>, and is appropriate for managing construction impacts from the Project.</p> <p>A meeting was held in October to agree on the structure for the Outline CoCP <b>[APP-300]</b>. A further meeting was held in January 2025 to address comments from stakeholders.</p> <p>A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP <b>[APP-300]</b>.</p> <p>A further iteration of the Outline CoCP <b>[APP-300]</b> was issued in May 2025 following the meeting and feedback in</p>	<p>No comments received on the structure of the Outline CoCP (1st and 2nd iterations) at the time of writing. It is therefore assumed that the structure of the CoCP is agreed.</p> <p>The content of the CoCP is still under discussion.</p>	Under discussion
<b>Other matters as required</b>				

### 3.11 Development Consent Order

3.11.1 Babergh and Mid Suffolk District Council defer to Suffolk County Council regarding the draft Development Consent Order and proposed requirements within the Statement of Common Ground, and will work alongside all host authorities and the Applicant to progress this separately.

## 4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of Babergh and Mid Suffolk District Council:

.....

Date:

.....

# Abbreviations

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

<b>Abbreviation</b>	<b>Full Reference</b>
WSI	Written Scheme of Investigation
Zol	Zone of Influence
ZTV	Zone of Theoretical Visibility

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