

AENC-NG-CNS-REP-0023

# Norwich to Tilbury

## Volume 5: Reports and Statements

Document: 5.9.9 Draft Statement of Common Ground - Braintree  
District Council - Clean Version

Final Issue C

May 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)  
Regulations 2009 Regulation 5(2)(g)

**nationalgrid**

# Revision History

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

# Contents

---

<b>1.</b>	<b>Introduction</b>	<b>1</b>
1.1	Overview	1
1.2	Summary of matters under discussion	2
1.3	Project Description	10
1.4	Format and Structure of this Document	11
<b>2.</b>	<b>Record of Key Engagement</b>	<b>12</b>
2.1	Introduction	12
2.2	Summary of Key Engagement	12
<b>3.</b>	<b>Matters Agreed, Not Agreed or Under Discussion</b>	<b>22</b>
3.1	Overview	22
3.2	Project Development, Description and Design	23
3.3	Ecology and Biodiversity	32
3.4	Air Quality	48
3.5	Contaminated Land, Geology and Hydrogeology Matters	55
3.6	Agriculture and Soils	62
3.7	Noise and Vibration	73
3.8	Health and Wellbeing	92
3.9	Historic Environment	92
3.10	Landscape and Visual	109
3.11	Socio-economics, Recreation and Tourism	120
3.12	Cumulative Effects	120
3.13	Development Consent Order	127
<b>4.</b>	<b>Confirmation of Agreement</b>	<b>157</b>

---

Table 2.1	Summary of Key Engagement between National Grid and Braintree District Council	12
Table 3.1	Agreement Status for Matters Presented in Section 3	22
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters	23
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	32
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality	48
Table 3.5	Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology	55
Table 3.6	Matters Agreed, Not Agreed or Under Discussion in relation to Agriculture and Soils	62
Table 3.7	Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration	73
Table 3.8	Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment	92
Table 3.9	Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual	109
Table 3.10	Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects	120

Table 3.11	Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order	127
<hr/>		
	Abbreviations	158
<hr/>		
Appendix A	Draft DCO wording	
<hr/>		

# 1. Introduction

## 1.1 Overview

- 1.1.1 This draft Statement of Common Ground (SoCG) has been prepared relating to the application for development consent for the proposed Norwich to Tilbury project (the 'Project') made by National Grid Electricity Transmission plc (referred to as 'National Grid' within this document). It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.2 This SoCG has been prepared by National Grid as the Applicant and Braintree District Council (BDC). BDC is a prescribed consultee under Section 43 of the Planning Act 2008 (PA 2008) as a Host Authority.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents. All documents are available in the deposit locations and /or the Planning Inspectorate website.
- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties. It identifies areas of the Project within the Development Consent Order (DCO) application ('the Application'), where matters are agreed, under discussion or not agreed between the parties.
- 1.1.5 The engagement between the parties across the breadth of matters is ongoing. The SoCG is an evolving document and detailed wording within it is still being discussed between the parties.
- 1.1.6 This draft SoCG has been prepared for Deadline 4. It is intended to be a live and working document which will be updated as the Project progresses and shared with BDC at key points for discussion.
- 1.1.7 Future iterations will evolve from this point and all parties reserve the right to supplement the matters identified as we progress the discussions to ensure it is comprehensive. There are many items within it that although not currently agreed have the potential to be resolved. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.
- 1.1.8 The parties will continue to work together, seeking resolution where appropriate to ensure this SoCG is a reliable and up to date document which can inform the examination.
- 1.1.9 This SoCG has been structured to reflect topics of the Application which are relevant to BDC. The applicable matters considered within this SoCG apply to BDC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):
- Project development, description and design
  - Ecology and Biodiversity
  - Air Quality

- Noise and Vibration
- Health and Wellbeing
- Historic Environment
- Landscape and Visual
- Contaminated Land, Geology and Hydrogeology Matters
- 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>		
3.2.6 – Pylon route by Rivenhall Place	<p>BDC requests every effort should be made to protect the tree known locally as “Henry” near to pylon TB092, and that adequate controls are in place to ensure that the root system of this tree is not damaged during construction.</p> <p>Noting the concerns of BDC and following feedback from the public, together with the results of environmental surveys, Amendments have been made to the proposed project design and associated Limits of Deviation in this location to enable the retention of this tree known locally as “Henry”. An Arboricultural Method Statement will be produced for agreement with host authorities prior to construction commencing.</p>	Resolution likely by Deadline 7.
3.2.11 – Community Benefits	<p>BDC strongly encourage NGET to positively respond to the issue of social value and community benefits.</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.</p>	Matter unlikely to be agreed during Examination, as this is a post-consent matter.
<b>Ecology and Biodiversity</b>		
3.3.11 – Construction effects	<p>BDC have concerns regarding level of bat survey and construction effects upon bats.</p> <p>The Applicant is working with Natural England to produce a draft project wide bat licence. A letter of</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination.	
3.3.14 – Outline LEMP	<p>BDC position that further clarification is sought around bat hibernation potential.</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.</p>	Resolution likely by Deadline 7
3.3.16 – Biodiversity Net Gain - offsite	<p>BDC seeking further clarification around Offsite BNG provision.</p> <p>The Applicant maintains that offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.</p>	Resolution likely by Deadline 7
3.3.18 – Data sources (bats)	BDC to review the Applicant’s updated position in the SOCG regarding survey data provision. Applicant proposes this matter is agreed.	Resolution likely by Deadline 7
3.3.19 – Survey methodology (bats) 3.3.20 – Baseline conditions and receptors (bats) 3.3.21 – Standard mitigation	BDC require further bat roost surveys prior to DCO consent. The Applicant is not proposing further surveys pre-consent, and this approach has been agreed with Natural England.	Matter unlikely to be agreed during Examination.
<b>Contaminated Land, Geology and Hydrogeology</b>		
3.5.12 – Outline CoCP	<p>BDC is satisfied that these matters can be fully secured at the final CoCP stage, provided that the Applicant acknowledges the expectation that LPA approval of mitigation and remediation measures will be required.</p> <p>The Applicant can confirm that <b>7.2 Outline Code of Construction practice [REP3-025]</b> updated at Deadline 4 will include the matters raised by BDC regarding approvals, notifications and escalation.</p>	Resolution likely by Deadline 7
<b>Agriculture and Soils</b>		
3.6.3 – Data sources	<p>BDC does not agree that the data sources used for the Agriculture and Soils assessment are sufficient to provide a robust understanding of baseline soil conditions across the Order Limits.</p> <p>The Applicant is committed to undertake further post-consent soil surveys and notes that the scope,</p>	Resolution likely by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
	density and methodology of these surveys will be agreed with Natural England post-consent.	
3.6.5 – Key parameters and assumptions	<p>BDC acknowledges the key parameters and assumptions set out in the ES; however, the Council does not agree that these provide a sufficiently reliable basis for assessing agricultural and soil impacts.</p> <p>The Applicant maintains that the key parameters and assumptions presented are considered appropriate</p>	Matter unlikely to be agreed during Examination.
3.6.6 – Baseline conditions and receptors	<p>BDC does not agree that the baseline conditions and receptors for agriculture and soils have been characterised with sufficient confidence across the full extent of the Order Limits.</p> <p>The Applicant maintains that the baseline conditions and receptors presented are considered appropriate.</p>	Matter unlikely to be agreed during Examination.
3.6.7 – Embedded mitigation 3.6.8 – Standard mitigation	<p>BDC does not agree that the scope and methodology for standard or embedded mitigation is adequate.</p> <p>The Applicant maintains that the standard and embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects.</p> <p>The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.</p>	Matter unlikely to be agreed during Examination.
3.6.9 – Additional mitigation	<p>BDC notes the Applicant’s position that no additional mitigation is required; however, the Council cannot agree this conclusion at this stage.</p> <p>The Applicant maintains that no additional mitigation measures are proposed to minimise effects, other than the measures for handling organic-rich (peaty) soils, which are already set out within the standard mitigation Outline Soil Resource Plan (SRP) as part of the <b>7.2 Outline Code of Construction Practice [REP3-025]</b></p> <p>The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.</p>	Matter unlikely to be agreed during Examination.
3.6.10 – Construction effects	BDC considers the assessment of construction, operational (and maintenance) effects to be Under Discussion pending clarification and securing of the	Matter unlikely to be agreed

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.6.11 – Operational (and maintenance) effects	<p>post-consent soil survey commitments and reinstatement requirements.</p> <p>The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.</p>	during Examination.
3.6.14 – Outline CoCP	<p>BDC acknowledges that the Outline Code of Construction Practice sets out soil handling and protection measures relevant to agriculture and soils. However, the Council cannot agree that the CoCP provides sufficient certainty at this stage.</p> <p>The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.</p>	Matter unlikely to be agreed during Examination.
<b>Noise and Vibration</b>		
3.7.5 – Key parameters and assumptions	BDC does not agree that the key parameters and assumptions used in the Noise and Vibration assessment represent a robust or reliable worst-case scenario.	Matter unlikely to be agreed during Examination.
3.7.7 – Embedded mitigation 3.7.8 – Standard mitigation 3.7.9 – Additional Mitigation	<p>BDC does not agree that the mitigation measures are appropriately demonstrated or sufficient to ensure that significant adverse noise and vibration effects will be avoided.</p> <p>The Applicant considers embedded, standard and additional mitigation is appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	Matter unlikely to be agreed during Examination.
3.7.10 – Construction effects	<p>BDC does not agree with the Applicant’s conclusion that significant adverse construction noise and vibration effects are unlikely to occur.</p> <p>The Applicant maintains that the assessment of effects during construction presented is considered appropriate.</p>	Matter unlikely to be agreed during Examination.
3.7.11 - Operational (and maintenance) effects	BDC has no substantive objections in principle, however this matter remains under discussion pending further detailed design information (post-consent).	Matter unlikely to be agreed during Examination, as this is a post-consent matter.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.7.12 – Outline CoCP	BDC does not agree that the Outline CoCP, in its current form, provides sufficient clarity or secured commitments to demonstrate that construction noise and vibration impacts will be adequately controlled. The Applicant considers that this is a post-consent matter.	Matter unlikely to be agreed during Examination, as this is a post-consent matter.
3.7.13 – NSR off Old Mill Lane	BDC argues the Applicant has not shown that significant construction noise impacts can be avoided at Threadkells and similar rural receptors. The Applicant states BDC’s interpretation is not applicable because the weekend assessment includes mitigation and management measures.	Matter unlikely to be agreed during Examination.
3.7.14 – LOD requirements	BDC does not agree that the Environmental Statement has robustly assessed the worst case construction noise and vibration impacts arising from the full extent of the Limits of Deviation (LoD). The Applicant maintains the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the <b>7.2 Outline Code of Construction Practice [REP3-025]</b> for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon such that significant adverse effects are avoided.	Matter unlikely to be agreed during Examination.
3.7.15 – Noise limits	BDC maintains that a specific, enforceable noise limit should apply to start-up and close-down periods at the nearest NSRs. The Applicant maintains that there are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as detailed in Section 4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> .	Matter unlikely to be agreed during Examination.
3.7.17 – Noise screening	Disagreement in how the inclusion of noise screening has been applied.	Matter unlikely to be agreed during Examination.
<b>Historic Environment</b>		
3.8.6 – Data sources	BDC consider that the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review.	Matter unlikely to be agreed

SoCG ID	Summary of matter under discussion	Deadline for resolution
(archaeology) – survey data	The Applicant expects final reports for the archaeological trial trenching in August 2026.	during Examination.
3.8.10 – Key parameters and assumptions (archaeology)	BDC maintains that until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that “ <i>The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.</i> ”  The Applicant expects final reports for the archaeological trial trenching in August 2026.	Matter unlikely to be agreed during Examination.
3.8.13 – Embedded mitigation	BDC require further time to review <b>5.15 Design Development Report [APP-122]</b> .	Resolution likely by Deadline 7
3.8.14a – Standard mitigation (built heritage)	BDC does not agree that H07 is adequate. While the vibration assessment identifies only one designated asset outside Braintree (Little Bromley War Memorial), BDC considers that the mitigation commitment must be applicable scheme-wide.  The Applicant notes that commitments NV01, NV02, NC03, NV04, NV05, and NV20 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b> all address points regarding vibration.	Matter unlikely to be agreed during Examination.
3.8.16 – Additional mitigation	The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation.  The Applicant is currently preparing an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> scheduled for submission at Deadline 5.	Resolution likely by Deadline 7
3.8.21 – Outline CoCP	The Applicant will continue to liaise with BDC on this matter but propose this matter is agreed.	Resolution likely by Deadline 7
3.8.24 – Outline Archaeological Mitigation Strategy and Outline WSI	The AMS-WSI remains under review, and BDC is not yet able to confirm agreement pending further detailed examination of the April 2025 iteration.  The Applicant is currently preparing an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> scheduled for submission at Deadline 5.	Resolution likely by Deadline 7
<b>Landscape and Visual</b>		
3.9.13 – Outline LEMP	BDC does not yet agree that the Outline LEMP provides an adequate or sufficiently detailed basis for	Matter unlikely to be agreed

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>managing the operational landscape and visual effects of the Project.</p> <p>The Applicant maintains that <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>during Examination.</p>
<b>Cumulative Effects</b>		
<p>3.10.3 – Data Sources</p>	<p>BDC does not agree that the cumulative effects assessment presented in ES Chapter 17 represents a complete or robust evaluation of cumulative impacts.</p> <p>The Applicant undertakes monthly reviews of planning registers, and where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate).</p>	<p>Resolution likely by Deadline 7</p>
<p>3.10.4 - Assessment Methodology</p> <p>3.10.5 – Key parameters and assumptions</p> <p>3.10.6 – Baseline conditions and receptors</p>	<p>BDC has concerns with these sections of both intra<sup>[06]</sup>project and inter<sup>[06]</sup>project assessments.</p> <p>The Applicant maintains that the methodology for assessing Cumulative Effects was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>Matter unlikely to be agreed during Examination.</p>
<p>3.10.7 – Embedded mitigation</p> <p>3.10.8 – Standard mitigation</p> <p>3.10.9 – Additional mitigation</p>	<p>BDC does not agree that the mitigation presented is adequate.</p> <p>The Applicant considers embedded mitigation to be appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Matter unlikely to be agreed during Examination.</p>
<p>3.10.10 – Construction effects</p> <p>3.10.11 – Operational (and maintenance) effects</p> <p>3.10.12 – Outline CoCP</p>	<p>BDC has concerns with the methodology of these sections in both intra<sup>[06]</sup>project and inter<sup>[06]</sup>project assessments.</p> <p>The Applicant maintains that the methodology for assessing Cumulative Effects was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>Matter unlikely to be agreed during Examination.</p>

SoCG ID	Summary of matter under discussion	Deadline for resolution
<b>Development Consent Order</b>		
3.11.1 – Management plans	<p>BDC has concerns that the absence of a standalone Construction Environmental Management Plan (CEMP) risks gaps in environmental control.</p> <p>Applicant maintains that <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required.</p>	Matter unlikely to be agreed during Examination.
3.11.3 – Construction management plans	<p>BDC remains concerned that the draft DCO does not include a dedicated Soil Management Plan Requirement.</p> <p>The Applicant notes <b>7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]</b> is controlled by Requirement 4 of Schedule 3 to the <b>3.1 Draft Development Consent Order [REP3-004]</b></p>	Matter unlikely to be agreed during Examination
3.11.4 – Applications made under requirements	<p>BDC does not agree that a 28 day determination period is appropriate or realistic for discharging Requirements associated with a project of this scale.</p> <p>The Applicant (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days.</p>	Resolution likely by Deadline 7.
3.11.6 - Fees	<p>BDC agrees that Schedule 4 must be updated to reflect the latest planning fee regulations.</p> <p>The Applicant has updated this figure in <b>3.1 Draft DCO [REP3-004]</b>.</p>	Resolution likely by Deadline 7.
3.11.8 – Stages of the authorised development	<p>BDC reiterates its request (REP1[REDACTED]149, para. 16.2.52) that a minimum of 10 working days’ notice be provided prior to the commencement of works under any stage.</p> <p>This matter remains under discussion.</p>	Resolution likely by Deadline 7.
3.11.9 – Design and layout plans	<p>BDC does not agree that the current drafting of Requirement 6 provides sufficient control over the design and layout of the authorised development.</p> <p>The Applicant maintains that the wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the <b>3.1 Draft DCO [REP3-004]</b>.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.11.12 - DCO Wording	<p>Discussions are ongoing in relation to detailed drafting points on:</p> <ul style="list-style-type: none"> <li>• Notification process;</li> <li>• DCO Wording – Geology and Hydrogeology;</li> <li>• DCO Wording – Air Quality and Emissions;</li> <li>• Certified documents;</li> <li>• Definition of ‘maintenance’;</li> <li>• Power to alter layout etc. of streets;</li> <li>• Protective Works;</li> <li>• Trees subject to Tree Preservation Orders;</li> <li>• Definitions and terminology; and</li> <li>• Service of Notices.</li> </ul>	Resolution likely by Deadline 7.

## 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 BDC
  - **Section 3** summarises the key matters and captures the status of each issue / matter
  - **Section 4** includes the sign off sheet

## 2. Record of Key Engagement

### 2.1 Introduction

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

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

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

### 2.2 Summary of Key Engagement

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

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

Table 2.1 Summary of Key Engagement between National Grid and Braintree District Council

Date	Format	Topic/description
<b>General</b>		
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.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
October 2023 – Ongoing	Meeting	Monthly informal catch-up meetings.
November 2023	Meeting	All host authority workshop.
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) and Outline Landscape and Ecology Management Plan (LEMP) to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
October 2024	Meeting	Meeting to discuss heritage assessment
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid issued the 2nd iteration draft versions of the Outline CoCP and Outline LEMP to all host authorities for comment.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on the 2nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline CoCP including Appendix H – Draft Greenhouse Gas Reduction strategy.
May 2025	Email Correspondence	National Grid shared the ES Appendix 17.1: Long List of Other Developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the traffic, transport and PRow section of the Environmental Statement
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
<b>Ecology and Biodiversity</b>		
July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from stakeholders.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.

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

### **Air Quality**

September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
----------------	----------------------	---

### **Noise and Vibration**

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

### **Health and Wellbeing**

September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment,

Date	Format	Topic/description
		including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical Note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
December 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES (additional)
<b>Historic Environment</b>		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities 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.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
June 2024	Meeting	Archaeology Working Group Meeting
August 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting – aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
October 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	National Grid shared the setting survey locations with stakeholders.
December 2024	Meeting	Archaeology Working Group Meeting
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid shared the Heritage Viewpoints Documents with stakeholders.
February 2025	Email Correspondence	National Grid shared the Draft Heritage Baseline Report with stakeholders.
February 2025	Meeting	Thematic group meeting to further discussions regarding the Historic Environment Viewpoints.
February 2025	Meeting	Meeting to discuss the Draft Heritage Baseline Report.
March 2025	Email Correspondence	National Grid issued updated the Historic Environment Viewpoints information to stakeholders including BDC.
April 2025	Email Correspondence	National Grid issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Archaeology Working Group Meeting

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	National Grid shared an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 012
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Email Correspondence	National Grid shared updated SSWSIs site 12
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
November 2025	Email Correspondence	National Grid shared shapefile for the phase 2 survey along with the priority area survey.
November 2025	Meeting	Archaeology Working Group Meeting
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email Correspondence	National Grid shared the WSI for the Phase 2 geophysical survey.
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss Essex Place Services (EPS) comments on the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
January 2026	Meeting	Meeting to discuss matters relating to Built Heritage in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to the Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group Meeting
March 2026	Meeting	Archaeology Working Group Meeting

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
<b>Landscape and Visual</b>		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	Thematic Group meeting – proposed viewpoint locations - Essex
April 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023	Meeting	EIA viewpoints meeting - Essex
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the development consent application.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology.
March 2025	Email Correspondence	National Grid issued the draft Arboricultural Impact Assessment.
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
October 2025	Meeting	Further optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
February 2026	Meeting	Meeting to discuss the Landscape sections of the Statement of Common Ground.
March 2026	Email Correspondence	National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BDC's Local Impact Report

### **Socio-economics, Recreation and Tourism**

July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including BDC.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.

<b>Date</b>	<b>Format</b>	<b>Topic/description</b>
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical Note on the ES Chapter.

# 3. Matters Agreed, Not Agreed or Under Discussion

## 3.1 Overview

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

Table 3.1 Agreement Status for Matters Presented in Section 3

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

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 Table 3.2 to Table 3.11 provides the matters agreed, not agreed or under discussion in relation to the various topics.

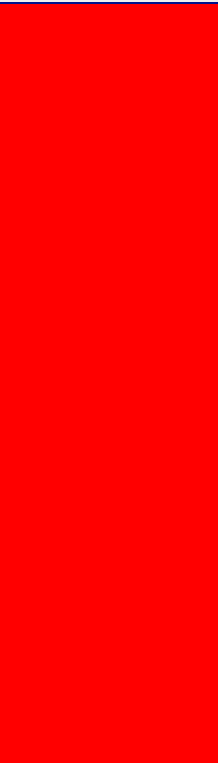
## 3.2 Project Development, Description and Design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters

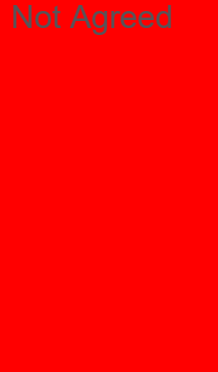
ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>Strategic options/needs case</b>				
3.2.1	Needs case	<p>Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) 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 and detailed response to the Hiorns Report, please refer to Section 3.2 'Needs Case and Timing' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. To summarise, the need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual. The Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative.</p>	<p>While BDC accept the overall needs case for network reinforcement (in principle) BDC does not agree that the Applicant has adequately demonstrated the need case for the Norwich to Tilbury project at this time. The Applicant has confirmed that no further evidence will be provided to justify the timing or scale of reinforcement required, despite significant uncertainty around the contracted generation assumed in the need case and the likelihood that many of these projects will connect by 2030. BDC notes that the Applicant has not addressed the findings of the Hiorns Report, which concludes that contracted generation volumes are unlikely to materialise as assumed and that reinforcement could potentially be deferred without constraining offshore wind delivery. In the absence of updated sensitivity testing, transparency on the status of contracted connections, or further justification on timing, BDC cannot yet support the asserted urgency or necessity of this specific reinforcement proposal.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2.2	Project timing	<p>Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. The Applicant is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.</p> <p>Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.</p> <p>For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. To summarise, the need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual. The Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative.</p>	<p>BDC does not agree that the Applicant has demonstrated a sufficiently robust or transparent basis for the asserted 2030 delivery deadline. While BDC recognises National Grid's licence obligations, the Council remains concerned that the contracted connection dates underpinning the timing case have not been tested against the real-world readiness of those generation projects. Evidence referenced in the Examination, particularly the findings of the Hiorns Report, indicates significant uncertainty in whether generators will connect at the volume and pace assumed. This could materially affect both the urgency of reinforcement and the viability of alternative solutions. BDC therefore maintains that a further review of the contracted generation position and connection readiness is required in order to properly substantiate the timescale for Norwich to Tilbury.</p>	Not Agreed
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</p>	<p>BDC does not agree that the submitted overhead line route represents the only, or the least-harm, strategic option. BDC considers that credible alternatives—specifically an offshore-centred approach or High Voltage Direct Current (HVDC) undergrounding—should be</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>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 'Alternatives – Offshore Alternatives' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. With regard to the Hiorns Report, as set out under 3.2.1 Needs Case above, the Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative.</p>	<p>fully explored, particularly if updated analysis shows that the contracted generation and delivery timescales are less acute than currently asserted. Evidence presented in the Examination, including the Hiorns Report, indicates significant uncertainty in the readiness and timing of contracted generation projects. If reinforcement is not required as urgently as the Applicant claims, this could materially improve the feasibility of alternatives that would substantially reduce the scale of onshore infrastructure across Braintree District and wider Essex. BDC therefore maintains that a transparent reassessment of route strategy is required before the onshore overhead line can be justified.</p>	
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p>	<p>BDC does not agree that a predominantly overhead line route has been justified or that the Applicant has demonstrated that an overhead HVAC solution represents the least-harm or most appropriate option for this project. BDC acknowledges that EN5 establishes a general expectation in favour of overhead lines, but notes that this presumption is not absolute, and that EN5 requires applicants to evidence that all feasible alternatives, including undergrounding and offshore options, have been robustly assessed in environmental, technical and cost terms.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p>For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>Based on the current evidence, BDC considers that the Applicant's appraisal of alternatives remains incomplete. The Council maintains that offshore-centred approaches and HVDC undergrounding remain credible strategic options, particularly given the significant and permanent landscape, visual, ecological, heritage and arboricultural impacts of the proposed overhead line within Braintree District. BDC also notes that uncertainty around the project's timing and contracted generation (as highlighted in the Hiorns Report) may materially affect the feasibility and deliverability of non-overhead alternatives.</p> <p>Accordingly, BDC's view is that the Applicant must undertake a more transparent and robust comparative assessment, including updated need-case sensitivity testing, before the overhead line route can be justified as the most appropriate option.</p>	

**Project development process - Design**

3.2.5	Design Principles	<p>The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational reliability, can significantly limit the Applicant's ability to adapt the aesthetic appearance of its infrastructure.</p> <p>Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules</p>	<p>BDC agrees that good design must operate within functional and safety constraints, but considers that the Applicant has not demonstrated that the design process has adequately responded to local character, place-specific sensitivities, or the opportunities for innovative mitigation required by EN1 and the Planning Inspectorate's Advice on Good Design. BDC notes that the proposed lattice pylon design and 50m overhead line solution</p>	
-------	-------------------	---	--	---

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>(relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals.</p> <p>While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and documented through the Development Consent Order process.</p> <p>Furthermore, NPS EN-1 encourages developers "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible" within the bounds of functional and safety constraints.</p> <p>The Planning Inspectorate Good Design advice advises that 'Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important'. EN-1 refers to the importance</p>	<p>would result in extensive, permanent and unavoidable landscape, visual and heritage harm, which indicates that the design process has not achieved a locally responsive outcome. BDC also considers that the Applicant has relied too heavily on the Holford and Horlock Rules without adequately addressing their limitations, particularly that they do not reflect modern landscape guidance, local distinctiveness, or updated national policy objectives. This concern is explicitly raised in BDC's alternatives assessment in ExQ1, where the use of Holford Rules is described as "unadopted and out of date."</p> <p>In BDC's view, good design for a project of this scale requires robust exploration of alternative technologies and forms, including innovative substation design, undergrounding, HVDC options and design-led solutions to minimise harm. Given the magnitude of local impacts, BDC considers that a more ambitious and locally responsive design approach is both possible and necessary to meet the expectations of EN-1 and the Planning Inspectorate's design advice.</p> <p>BDC therefore maintains that National Grid must demonstrate a fuller, more place-sensitive and iterative design process, exploring opportunities for innovation and reduction of harm while ensuring safety and functionality.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2.6	Pylon Route by Rivenhall Place	<p>of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the Design and Access Statement (document reference 7.15).</p> <p>For the Applicant's position on Design principles, please refer to Section 3.9 'Good Design' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>BDC welcomes the design amendment enabling the retention of the veteran oak known locally as "Henry" (T820), but remains concerned that the current Limits of Deviation could still permit movement of infrastructure closer to the tree. To ensure its long-term protection, BDC considers that the alignment in this location should be fixed, or that LoD be reduced, so that no part of the authorised development can encroach further into the tree's Root Protection Area.</p> <p>Given the irreplaceable nature of veteran trees, BDC requires that detailed and enforceable arboricultural controls — including a project-specific Arboricultural Method Statement (AMS), Tree Protection Plan (TPP), and clearly defined Root Protection Area safeguards — are secured through the DCO and agreed with the LPA prior to any construction works. These measures must ensure that the tree's root</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			system, ground conditions and wider health are not adversely affected during construction. .	
<b>Project development process - Consultation</b>				
3.2.7	2022 non-statutory consultation	<p>Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the <a href="#">Consultation Strategy</a>, and responses to feedback received during consultation are included in the <a href="#">Feedback Report</a>.</p> <p>The non-statutory consultation was undertaken in accordance with the published <a href="#">Consultation Strategy</a>.</p>	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.8	2023 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the <a href="#">Consultation Strategy</a>, and responses to feedback received during consultation are included in the <a href="#">Feedback Report</a>.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.9	2024 statutory consultation	<p>Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the <a href="#">Statement of Community Consultation (SoCC)</a>. Responses to feedback received during statutory</p>	BDC have no evidence to suggest that the statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2.10	2025 targeted consultation	<p>consultation are contained within the <b>5.1 Consultation Report [APP-066]</b>.</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p> <p>Targeted consultations for Essex took place from 25 February 2025 – 27 March 2025. Details of these consultations are outlined in the <a href="#">Targeted Consultation Strategy</a> and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within <b>5.1 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>	<p>BDC have no evidence to suggest that the targeted consultation was not undertaken in accordance with the published Consultation Strategy.</p> <p>While NG considered that some changes to the scheme may not be the most significant and are considered to be non-material, BDC considers that to local residents who may reside close to them, their significance may be greater, and they should therefore be given an opportunity to comment on them through the targeted consultation carried out earlier this year.</p> <p>The concentration of non-material changes may also have a bearing on their materiality and how they are experienced by local residents</p>	Agreed
<b>Other matters as required</b>				
3.2.11	Community Benefits	<p>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</p>	<p>BDC does not agree that the socio-economic impacts of the Project are negligible. As set out in the Local Impact Report, BDC considers that Norwich to Tilbury would give rise to extensive and long-term residual impacts on the local environment, landscape, wellbeing, and the wider community which cannot be fully</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's 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>mitigated or compensated through the planning or DCO framework. The Council therefore maintains that the national benefits of the project do not offset the scale of harm that would be borne locally.</p> <p>BDC strongly encourages National Grid to engage proactively and transparently with host authorities on the development of community benefit mechanisms, in line with the Government's Community Funds for Transmission Infrastructure guidance (DESNZ, 2025). While acknowledging that such benefits fall outside the DCO process, BDC considers the establishment of a substantial, place-specific community benefits package essential to address the significant residual effects on communities within Braintree District and the wider Essex area. The Council therefore expects National Grid to commit to collaborative engagement to secure meaningful investment and long-term positive outcomes for affected communities.</p>	

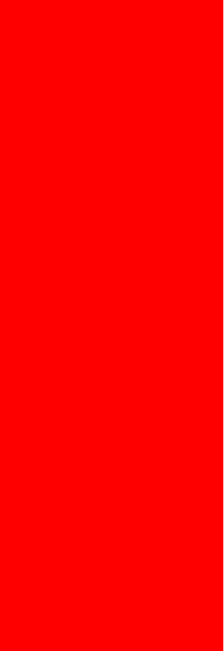
### 3.3 Ecology and Biodiversity

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


ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.3.1	Policy and legislation	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 Section 8.2 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The ES has identified the relevant legislation, policy and guidance. BDC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
<b>EIA – Approach and Methods</b>				
3.3.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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 (ecology, not arboriculture)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . Further survey information from the 2025 season has been submitted to the Planning	Sufficient desktop data has been collected for the ES. As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	information in the dataset is anticipated to be provided in November 2025; ECC position pending. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to bat survey data which requires further information and is noted in ID3.3.18.	
3.3.4	Assessment Methodology (ecology, not arboriculture)	The assessment methodology was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology (ecology, not arboriculture)	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. All methodologies for surveying licensable species have been agreed with Natural England.	The survey methods used are largely accepted, although note the comments made for ID3.3.19. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to survey methodology for bats which requires further information.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The key parameters and assumptions presented are considered appropriate.	BDC does not agree that the parameters and assumptions relating to habitat reinstatement and long-term ecological outcomes are sufficiently robust. While the assumptions listed in ES Section 8.4 are acknowledged, BDC considers the ES assumption that habitat removed during construction “would be reinstated” within a five-year establishment	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The Applicant has included within the <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> the commitment to a five-year monitoring period for tree and hedgerow replacement planting. Five years is considered sufficient to ensure successful establishment and is in line with other recent NSIP projects. Most planting failures happen within the first few years, and the five-year period captures this initial establishment risk and by year 5 provides a realistic picture of long-term success. It is considered that the early establishment can be a key determinant to later success.</p> <p>The monitoring period is adaptive, as stated within the <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> which includes like for like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure.</p> <p>The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which can be more determinative than the length of aftercare alone. <b>7.4 Outline Landscape and Ecological and Management Plan [REP3-030]</b> has highlighted some good practice principles, and these will be expanded upon with full details provided within the final Landscape and Ecological Management Plan to be discharged in accordance with</p>	<p>period to be overly optimistic and unsupported by evidence. This concern is reflected throughout the Council's ecological submissions, including the LIR (REP1-148) and relevant Deadline responses.</p> <p>BDC's view, informed by its ecologist, is that a five-year reinstatement and monitoring period is not sufficient to ensure comprehensive or reliable reinstatement success across a construction corridor of this scale, especially given:</p> <ul style="list-style-type: none"> <li>• the extensive vegetation removal required;</li> <li>• the diversity of habitat types affected;</li> <li>• the risk of partial or complete reinstatement failure; and</li> <li>• the ongoing operational vegetation-height restrictions along the corridor.</li> </ul> <p>BDC notes that the Outline LEMP's five-year period is significantly shorter than the ecological recovery timescales relevant to woodland edge, hedgerow, riparian and mixed rural habitats. The LIR highlights that predicted ecological impacts may be understated because the ES assumes successful reinstatement, whereas long-term failure is a material risk.</p> <p>BDC therefore considers that:</p> <ul style="list-style-type: none"> <li>• A longer monitoring and management period is required for reinstatement areas outside Environmental Areas (e.g., 10 years minimum), or</li> </ul>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Requirement 4 of <b>3.1 Draft Development Consent Order [REP3-004]. 7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. After this five-year aftercare period, the planting would be managed by the relevant landowner, as currently takes place in respect of the existing planting on private land.</p> <p>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>	<ul style="list-style-type: none"> <li>A mutually agreed replacement-failure percentage must be factored into compensation calculations to avoid over-reliance on assumed short-term recovery.</li> </ul> <p>These concerns were raised at the SoCG meeting in January 2026 and remain under review. BDC's ecologist has confirmed that they are not convinced a five-year management period will ensure successful habitat reinstatement and wishes this view to be formally recorded.</p> <p>Accordingly, BDC maintains that the Applicant's key ecological assumptions, particularly those relating to reinstatement and recovery within five years, cannot be agreed without strengthened monitoring, management and compensation commitments.</p>	

### EIA – Baseline Conditions

3.3.7	Baseline conditions and receptors	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of <b>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. The scope of baseline surveys for European</p>	<p>Circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending. Note also the comments made for ID 3.3.5.</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all</p>	
-------	-----------------------------------	---	--	--

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		protected species surveys (including for roosting bats) was agreed in advance with Natural England. The survey data collected is sufficient to inform a robust ecological impact assessment as set out within <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> .	areas apart from in relation to baseline conditions and receptors for bats which requires further information and set out in ID3.3.20.	
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.3.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of <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.	The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.9	Standard mitigation	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 the <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. The suggested clarifications on standard mitigation from BDC have been included within the <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> and the <b>7.2</b>	The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Outline LEMP documents have been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions to those documents. BDC confirmed in meeting regarding the Statement of Common Ground in 14 January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which requires further information (see ID3.3.20).	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Outline Code of Construction Practice [REP3-025]</b> provided with the application.</p> <p>Mitigation for roosting bats is being agreed with Natural England as part of the draft licence process.</p>		
3.3.10	Additional mitigation	<p>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>.</p> <p>Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.9).</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.</p>	Agreed

#### EIA – Assessment Conclusions

3.3.11	Construction effects	<p>The assessment of effects during construction is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The assessment of effects during construction presented is considered appropriate.</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>It would be useful transparency to advise on how long is it predicted to take for the long-term neutrality to be achieved for the affected receptors.</p> <p>The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision.</p> <p>BDC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation.</p>	Under Discussion
--------	----------------------	--	---	------------------

ID	Matter	National Grid's Position	Braintree District Council's 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 survey approach to bat roost surveys has been agreed with Natural England (the statutory responsible body for bats) and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</p> <p>The Applicant notes the comments and will continue to engage with BDC on this matter.</p>	<p>Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, <i>“the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees [any number of which could be classified PRF-M after further survey] and 16 trees with hibernation features.”</i></p> <p>As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected.</p> <p>The potential impact without any mitigation measures being applied is described in the ES Table 8.23: <i>“In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would</i></p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p><i>be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within the Order Limits. Effects would be considered significant."</i> However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s) (i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.9, this is not considered to be a reasonably supported assessment.</p> <p>What is being proposed is a quasi District Level Licence-type approach for roosting bats (i.e. getting DCO without first completing surveys), when BDC is not aware of any such DLL method for bats having been trialled and approved.</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around timeframes.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.3.12	Operational (and maintenance) effects	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 maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) is considered appropriate. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.3.13	Outline CoCP	<p>The <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant construction related mitigation measures specified in the <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>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</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</p>	<p>BDC does not agree that the Outline CoCP sufficiently secures ecological safeguards, particularly in relation to the level, qualifications and authority of the Ecological Clerk(s) of Works (ECoW). As set out in the LIR (REP1-148) and subsequent deadline submissions, the Council remains concerned that ecological mitigation in the ES relies heavily on effective, competent and authoritative ECoW oversight, yet the Outline CoCP does not prescribe any minimum qualifications, experience levels, decision-making authority or hierarchy for ECoWs across this large-scale project.</p> <p>Given the scale, ecological sensitivity and geographic spread of the construction corridor, BDC considers it essential that the DCO secures:</p> <ul style="list-style-type: none"> <li>• Clear minimum qualification and experience requirements for all ECoWs;</li> <li>• Defined competency requirements for species-specific tasks (e.g. PRF assessment and end scoping undertaken</li> </ul>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>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 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 the Applicant's Response to First Written Questions <b>[REP3-074]</b>.</p>	<p>only by a Natural England bat survey class licence holder, Level 2+);</p> <ul style="list-style-type: none"> <li>• A transparent ECoW hierarchy and decision-making structure, including the authority to halt works where necessary; and</li> <li>• Assurance that multiple ECoWs of varying grades are properly managed, supervised and empowered.</li> </ul> <p>BDC notes that its previous written comments on the Outline CoCP (22 Nov 2024 and 19 Feb 2025) included requests for these clarifications and remain unresolved. The LIR highlights that the success of ecological mitigation depends heavily on the quality of on-site ecological supervision, particularly in relation to protected species, bat roost management and habitat reinstatement.</p> <p>BDC's ecologist has confirmed that the Council is not satisfied with the Applicant's current assurances and remains unconvinced that the Outline CoCP provides adequate guarantees of ECoW competence or capacity. The Council therefore maintains that this matter cannot be agreed without strengthened, secured commitments within the DCO.</p>	
3.3.14	Outline LEMP	<p>The <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> includes all relevant operational related mitigation measures specified in <b>6.8 Environmental</b></p>	<p>The Outline LEMP has been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19<sup>th</sup> February 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline LEMP.</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>Natural England (the statutory responsible body for bats) have approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility.</p> <p>The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated Ground Level Tree</p>	<p>With respect to paragraph 6.1.8, clarity regarding the criteria used for defining a tree's bat hibernation potential is sought? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features?</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around bat hibernation.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Assessment (GLTA) survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above.		
<b>Other matters as required</b>				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The <b>7.1 Biodiversity Net Gain Report [APP-299]</b> sets out the approach to BNG.</p> <p>The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</p>	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.16	Biodiversity Net Gain (BNG) - Offsite	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The <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 including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others,</p>	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Offsite BNG.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>including the local nature recovery strategies (LNRs). 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>		
3.3.17	Arboricultural Impact Assessment (AIA)	<p>The <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]</b> has been prepared in accordance with the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> and is considered appropriate. The Applicant issued the draft AIA to BDC for comment in March 2025.</p> <p>The Applicant notes that BS5837 is a guidance document therefore compliance is not a requirement for this development consent application. The <b>6.19 Scoping Report [APP-288] to [APP-296]</b> highlights that there is deviation from the British Standard in terms of surveying Low value (C grade trees) and explained how these would be reported on (baseline data using canopy area and a 5 m root protection area applied to the canopy spread).</p> <p>This reference to the need for an Arboricultural Method Statement (AMS) to be produced (with</p>	<p>BDC does not agree that the Arboricultural Impact Assessment (APP-236) provides a sufficiently robust or complete evidence base to assess arboricultural impacts or to support the conclusions relied upon in the Environmental Statement. As set out in the LIR and reiterated in subsequent deadline submissions, the AIA does not comply with key BS5837:2012 parameters, including the requirement to survey and sequentially number all trees within (and adjacent to) the survey area. The omission or under-recording of trees, particularly Category C trees, which nevertheless have material environmental and amenity value in a rural landscape, significantly limits the Council's confidence in the accuracy of the baseline and the reliability of impact predictions.</p> <p>BDC also remains concerned that the AIA lacks the level of detail normally expected for a NSIP of this scale. The assessment does not provide a complete or clearly cross-referenced inventory of affected trees; nor does it include a</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>a tree protection plan) and to be agreed with the LPAs prior to construction work commencing can be found in the <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]</b>, the <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> and the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p> <p>The Applicant does not propose any further tree surveys during the pre-consent period. Paragraph 8.2.3 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> confirms that, following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p>	<p>draft Arboricultural Method Statement or Tree Protection Plan, both of which are essential to determine whether the proposed works, particularly those within or adjacent to Root Protection Areas, can be delivered without causing unacceptable harm. These concerns were highlighted in BDC's written SoCG feedback (21 December 2025) and remain unresolved.</p> <p>The Council's Tree Officer has confirmed that "the level of detail...is insufficient to allow a thorough review" and that repeated requests for essential survey information have not been addressed. Until an AIA consistent with BS5837 principles—with complete tree data, clearly identified RPAs, and draft AMS/TPP documents—is provided, BDC cannot accept the AIA findings or agree that arboricultural impacts are fully understood or appropriately mitigated. Accordingly, BDC maintains that the AIA is inadequate and cannot be relied upon, and that strengthened, secured DCO requirements, mirroring the detailed provisions requested in Requirement 8, are necessary to ensure tree protection and to prevent avoidable or excessive arboricultural loss.</p>	
3.3.18	Data sources (bats)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of the <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>.</p>	<p>As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p> <p>The Applicant proposes this matter is agreed.</p>	<p>information in the dataset is anticipated to be provided in November 2025; BDC position pending.</p>	
3.3.19	Survey Methodology (Bats)	<p>The Applicant issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p>All methodologies for surveying licensable species have been agreed with Natural England.</p> <p>No further bat roosting surveys are being undertaken. 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. In line with the requirements of The Conservation of Habitats and Species Regulations 2017, bat roosting surveys have been undertaken and further pre-commencement surveys will be completed post-consent. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.</p> <p>The Applicant proposes this matter is not agreed.</p>	<p>Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, BDC believes further survey effort prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data-based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/ compensation scheme.</p>	Under discussion
3.3.20	Baseline conditions and receptors (Bats)	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of <b>6.8 Environmental Statement</b></p>	<p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the baseline conditions and</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Chapter 8 - Ecology and Biodiversity [AS-026]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has been working closely with Natural England to produce a draft project wide bat licence. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination.</p>	<p>receptors for roosting bats requires further information and review.</p>	
3.3.21	Standard mitigation (Bats)	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and set out in the <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>The mitigation approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during</p>	<p>Measure B16's assumption that any action requiring a Natural England derogation licence can be "<i>reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit</i>" is considered unsound. BDC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11.</p> <p>BDC confirmed in meeting regarding the Statement of Common Ground in January 2026</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.	that the standard mitigation for bats requires further information and review	

### 3.4 Air Quality

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.4.1	Policy and legislation	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> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Acceptable.	Agreed
<b>EIA – Approach and Methods</b>				
3.4.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within	BDC raised the following comments in their relevant representations dated 27th November 2025:	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>.</p> <p>Whilst the geographic extent of the study is noted, the use of data from a single meteorological station is considered to be proportionate given the low predicted pollutant concentrations and low risk of causing air quality objective exceedances, as noted by the council.</p> <p>Any change or addition of meteorological data sites is not considered to materially affect the conclusions of the study.</p>	<ul style="list-style-type: none"> <li>Meteorological input data has been obtained for 2023 for a single recording station (Stansted Airport). Due to the length of the project route, it is likely that no single recording station would be representative of the whole study area and thus representative stations could be selected based on locality for example, section E (Braintree District Council) may be better represented by data from Andrewsfield Recording Station which is located further east than Stansted. It is noted however (and the Council are prepared to concede) that given that the assessment results are well below the objective levels, it is unlikely that this would change the overall conclusions of the assessment even if it did result in minor changes to the reported concentrations.</li> </ul>	
3.4.4	Assessment methodology	<p>The methodology for assessing Air Quality was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.4.5	Key parameters and assumptions	<p>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.</p>	<p>No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to key parameters and assumptions</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<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>BDC raised the following comments in their Relevant Representation dated 27<sup>th</sup> November 2025:</p> <ul style="list-style-type: none"> <li>Baseline conditions throughout the study area are reported to be good, with concentrations of NO2, PM10 and PM2.5 well below the relevant objectives/target values.</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 <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to embedded mitigation.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.4.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and set out in the <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>The Applicant notes that agreement with BDC on this matter is contingent on the proposed mitigation being fully implemented, which it intends to do.</p>	<p>BDC raised the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> <li>There are some predicted significant dust impacts in the absence of site specific mitigation. However, the residual impacts following the implementation of mitigation at high-risk sites is expected to be not significant. This is agreed but is contingent on the proposed mitigation being fully implemented.</li> </ul>	Agreed
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>No comments raised in the BDC relevant representations or through review of the Statement of Common Ground for Air Quality in relation to standard mitigation.</p>	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>Braintree District Council raised the following comments in their Relevant Representation dated 27<sup>th</sup> November 2025:</p> <ul style="list-style-type: none"> <li>The ES assessment assumes that construction dust effects would occur across the full extent of the Order Limits. Likewise, it is assumed where there is uncertainty regarding the scale of earthworks that a</li> </ul>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			'large' magnitude applies. These are a worst-case approach but are considered appropriate in the circumstances to reduce uncertainty and capture the fullest possible extent of impacts.	
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.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to operational effects.	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.4.12	Outline CoCP	Section 7.6 of the air quality assessment in <b>6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]</b> discusses proposed mitigation. The chapter cross references to <b>7.2 Outline Code of Construction Practice [REP3-025]</b> and <b>7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]</b> . Both of these documents provide further clarification and alignment on the mitigation proposed in the Environmental Statement, including emissions standards for NRMM and the siting of generators which are a subset of NRMM. <b>7.2 Outline Code of Construction Practice Appendix D Outline Dust Management Plan [APP-304]</b> outlines mitigation measures to minimise emissions from NRMM with commitments set out in Annex A of the	BDC raised the following comments in their Relevant Representation dated 27 November 2025: <ul style="list-style-type: none"> <li>It is recognised that there is some uncertainty regarding Nonroad Mobile Machinery (NRMM) emissions associated with the project; the proposed mitigation measures appear appropriate although their likely effect cannot be quantified. The Council have previously suggested that mention could be made of siting of Nonroad Mobile Machinery (NRMM) and ensuring it is compliant with emissions regulations within the Outline Code of Construction Practice (OCoCP). This however has not been implemented, and it is suggested the OCoCP is updated to include this. Notably it is included in the Dust Management Plan</li> </ul>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>document. Paragraph A.1.7 confirms that the Project will be carried out in accordance with legislation relevant to generators. Reference to being in accordance with legislation is not included within <b>7.2 Outline Code of Construction Practice [REP3-025]</b> at AQ02, however, GG19 states that '<i>Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for vehicle type which will be defined in the CoCP.</i>' It then goes on to list potential, appropriate standards, including those for NRMM.</p> <p>NRMM, in particular heavy construction plant is expected to move around within the Draft Order Limits to facilitate construction of the Project. The use of construction NRMM with suitable controls and site management is unlikely to result in significant effects on local air quality according to the guidance from Local Air Quality Management – Technical Guidance (TG22)<sup>1</sup> Paragraph 7.30 (Department of Environment Food and Rural Affairs (Defra), 2022).</p> <p>Additionally commitment AQ01 of <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes the following "<i>Plan the site layout so that machinery and dust-causing activities are</i></p>	<p>(DMP). The Council would recommend that section AQ02 in the OCoCP be amended for consistency across related documents</p>	

<sup>1</sup> Defra 2025 Local Air Quality Management Technical Guidance (TG22) Available at: <https://laqm.defra.gov.uk/wp-content/uploads/2021/03/LAQM-TG22-May-25-v2.1.pdf>. Accessed: March 2026.

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><i>located away from receptors, as far as practical or possible."</i></p> <p>It is considered that commitment GG19 governing emission standards and this response explaining siting of generators addresses the concerns expressed by the Local Planning Authority and that the Applicant's documents already reflect the outcome the Local Planning Authority is seeking through its request.</p>		

### 3.5 Contaminated Land, Geology and Hydrogeology Matters

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 9.2 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The relevant policy context, legislation and guidance has been presented within the ES.	Agreed
<b>EIA – Approach and Methods</b>				
3.5.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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. The Study Area used within the ES is in accordance with that agreed within the Scoping Report and Scoping Opinion.	Agreed
3.5.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . The list within paragraph 9.4.2 in <b>6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology</b>	<ul style="list-style-type: none"> <li>BDC summarise the following comments from their relevant reps from November 2025: A review of the Contaminated Land Geology and Hydrogeology ES Chapter [APP-181] Section 9.4.2 did not identify a</li> </ul>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>[APP-181] states the sources of information used to inform the baseline assessment, which include georeferenced historical Ordnance Survey maps from the National Library of Scotland and historical Ordnance Survey maps from Envirocheck reports generally for areas of anticipated undergrounding. This is also included within <b>6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]. 6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182]</b> describes the various sources of information used to inform the assessment for all sections of the Project (including that parts of the Project under Braintree District Council's jurisdiction). The Envirocheck reports were obtained to provide additional information in areas of significant undergrounding/ trenchless crossings and therefore they do not cover Section E (Braintree). The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over</p>	<p>reference to the source(s) of information utilised to identify potentially contaminative previous land uses, although reference to NLS mapping is included in the Bibliography of the ES chapter. However, Section 9.1.6 of the accompanying Baseline Information and Preliminary Contamination Risk Assessment [APP-182] does make reference to historical Ordnance Survey maps from Envirocheck reports as sources of information but for 'parts of the route' only. The baseline condition data sources require further clarity. Although BDC would generally agree with the low risk rating awarded to all identified sources of contamination within Section 5 of the site, further details of the specific information upon which the various low risk ratings were based is requested. Information on how the baseline conditions relating to Unexploded Ordnance (UXO) have been identified is required.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).</p>		
3.5.4	Assessment methodology	<p>The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The methodology used within the ES is in line with the approach presented within the Scoping Report.</p>	Agreed
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>BDC does not have any comments specifically on the key parameters and assumptions presented within the ES.</p>	Agreed
<b>EIA – Baseline Conditions</b>				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land</b></p>	<p>BDC does not have any comments specifically on the baseline conditions and receptors within the ES.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Geology and Hydrogeology [APP-181].</b> The baseline conditions and receptors presented are considered appropriate.</p>		
<p><b>EIA – Embedded, Standard and Additional Mitigation Measures</b></p>				
3.5.7	<p>Embedded mitigation</p>	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BDC does not have any comments specifically on the embedded mitigation presented within the ES.</p>	<p>Agreed</p>
3.5.8	<p>Standard mitigation</p>	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> and set out in the <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>BDC does not have any comments specifically on the standard mitigation measures presented within the ES.</p>	<p>Agreed</p>
3.5.9	<p>Additional mitigation</p>	<p>The consideration of additional mitigation measures are presented in Section 9.6 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The ES report states that over and above the embedded and standard mitigation measures, no additional mitigation measures are necessary. BDC has no comments on additional mitigation.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Assessment Conclusions</b>				
3.5.10	Construction effects	<p>The assessment of effects during construction is presented in Section 9.7 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. The assessment of effects during construction presented is considered appropriate. The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).</p>	<p>BDC's only outstanding comment about construction effects is that UXO is mentioned only in relation to embedded mitigation. Clarification on the Applicant's approach to assessing and managing the construction phase UXO risk has been provided.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.5.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 9.7 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>BDC does not have any further comments with regards to operational effects within the ES.</p>	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.5.12	Outline CoCP	<p>The Outline CoCP includes all relevant construction mitigation measures specified in <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Commitment GH10 describes that the results of risk assessments undertaken in accordance with LC:RM will be discussed with the LPA and EA, and any mitigation or remediation considered necessary will be agreed with the LPA and EA. Commitment GH08 that relates to a protocol for dealing with any unexpected contamination includes for provision of a policy describing how notifications and approvals will be agreed with the LPA.</p> <p>The Applicant can confirm that the outline CoCP updated at Deadline 4 will include the matters raised</p>	<p>BDC agrees that the Outline CoCP broadly covers the relevant topic areas for contaminated land, geology and hydrogeology and that the outline level is appropriate at this stage. However, BDC requires further clarification on how the notification, approval and escalation mechanisms embedded in GH08 and GH10 will operate in practice, particularly in relation to the Local Planning Authority's role in approving method statements, mitigation measures and remediation works arising from unexpected contamination.</p> <p>BDC considers that the Outline CoCP, together with draft Requirement 4, does provide a workable route for securing an unexpected contamination protocol in the final CoCP. Under Requirement 4, the full CoCP must be approved in writing by the relevant planning authority and must accord with the Outline CoCP. This provides a mechanism to ensure</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		by BDC regarding approvals, notifications and escalation.	<p>that the finalised unexpected contamination protocol includes LPA approval points for any investigation, risk assessment, remediation strategy and verification reporting—mirroring standard planning practice for unexpected contamination conditions.</p> <p>However, BDC seeks confirmation from the Applicant that the full CoCP will explicitly include:</p> <ul style="list-style-type: none"> <li>• LPA written approval of any method statements, mitigation and remediation works triggered by unexpected contamination;</li> <li>• a clear notification procedure, including timescales for responding to contamination incidents; and</li> <li>• clarity on how the escalation policy interacts with LPA approval for remediation actions.</li> </ul> <p>Given the low contamination risk profile within Braintree District and the structure of Requirement 4, BDC is satisfied that these matters can be fully secured at the final CoCP stage, provided that the Applicant acknowledges the expectation that LPA approval of mitigation and remediation measures will be required.</p> <p>Until this clarification is explicitly secured, the matter cannot yet be agreed.</p>	

## 3.6 Agriculture and Soils

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered in the assessment of Agriculture and Soils are noted in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 6.2 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>.</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the Agriculture and Soils assessment.</p>	<p>BDC agrees that the relevant national and local policy, legislation and guidance relating to agriculture and soils have been correctly identified in the ES.</p> <p>The Council notes, however, that compliance with this policy framework depends on the adequacy of baseline data, survey methodology, and the robustness of the mitigation and reinstatement commitments secured through the DCO. As set out in the Council's Local Impact Report, Deadline 3 response and ExQ1 submissions, these matters remain under discussion and are addressed in subsequent SoCG items.</p>	Agreed
<b>EIA – Approach and Methods</b>				
3.6.2	Study area	<p>The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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
3.6.3	Data sources	<p>Sufficient survey data, including a detailed Agricultural Land Classification (ALC) survey and supporting predictive ALC grading, has been collected to inform the assessment as presented within Section 6.4 of <b>6.6 Environmental</b></p>	<p>BDC does not agree that the data sources used for the Agriculture and Soils assessment are sufficient to provide a robust understanding of baseline soil conditions across the Order Limits.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Statement Chapter 6 - Agriculture and Soils [APP-138].</b></p> <p>As presented in <b>6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]</b> and <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>, predictive Agricultural Land Classification (ALC) mapping was undertaken on a 100 m grid across the entire Order Limits, including points where auger surveys had been undertaken. This approach allowed for predictive ALC grading in areas where detailed surveys were not possible, as well as analysis of the accuracy of the predictions (comparing predictive grades against surveyed grades). ALC surveys were undertaken within the Order Limits, along the central alignment; out of a total of 1,877 survey points, 1,011 comprise detailed site surveys and 866 comprise a predictive assessment.</p> <p>Figure A6.1.1 Detailed Agricultural Land Classification within <b>6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]</b> included an error whereby the surveyed ALC grades were not visible on the ALC map. As a result, it appeared that the final ALC mapping units were derived solely from the predictive model, which was not the case. The ALC mapping units were informed by both survey data and predictive modelling. This error has been corrected, and Figure A6.1.1 Detailed Agricultural Land Classification has been</p>	<p>As set out in the Council's Local Impact Report, ExQ1 responses and Deadline 3 submission, limitations in the Applicant's ALC survey methodology—including reduced excavation of soil pits, reliance on auger data to infer deeper soil horizons, limited PSD sampling, and extensive use of predictive ALC modelling—introduce uncertainty in the accuracy of soil classification, BMV land estimation, and reinstatement expectations.</p> <p>The Council welcomes the Applicant's commitment to undertake further post-consent soil surveys but notes that the scope, density and methodology of these surveys are not yet secured. Until minimum survey requirements and full coverage of all predictively-graded areas are confirmed, baseline data confidence remains incomplete.</p> <p>Accordingly, BDC considers this matter Under Discussion pending clarification and securing of the necessary survey commitments</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>updated in <b>6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report Figure A6.1.1 - Detailed Agricultural Land Classification (ALC) [REP1-062]</b>.</p> <p>The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of the Outline Soil Resource Plan.</p>		
3.6.4	Assessment methodology	The assessment methodology was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.5	Key parameters and assumptions	<p>Key parameters and assumptions made with regards to Agriculture and Soils are summarised in Section 6.4 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p><b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b> details the total extent of the Order Limits as 3,755 ha. It was calculated that 3,461 ha of agricultural land would be temporarily removed from agricultural production during construction, while a further</p>	<p>BDC acknowledges the key parameters and assumptions set out in the ES; however, the Council does not agree that these provide a sufficiently reliable basis for assessing agricultural and soil impacts.</p> <p>As identified in 3.6.3, limitations in baseline soil data and the use of predictive ALC modelling introduce uncertainty into several underlying assumptions, including the distribution of BMV land, soil wetness and droughtiness</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>203.1 ha would be lost permanently during operation (including 172.7 ha which is Best and Most Versatile (BMV) agricultural land); the remainder of the Order Limits comprises urban and non-agricultural land. The Applicant can confirm that the permanent loss of agricultural land has not been included within the assessment of temporary land loss.</p> <p>As stated in <b>6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]</b>, the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the revised ALC guidelines by competent soil scientists following the British Society of Soil Science (BSSS) Professional Competency in Soil Science No.2 - Agricultural Land Classification - England and Wales. A total of 16 soil pits were dug and assessed covering the representative soil types and cross checked with best available data, including descriptions of structure for soil associations and soil series. Undertaking further soil pits was constrained by landowner access issues but it is considered the information gathered is sufficient to support the land grade assessments.</p>	<p>limitations, and expectations for reinstatement. The Council's Deadline 3 response further highlights that assumptions reliant on auger-only data, limited PSD sampling, and inferred soil horizon characteristics may not reflect actual field conditions across the Order Limits.</p> <p>BDC therefore considers that the robustness of the ES parameters is dependent on securing clearer commitments to post-consent soil survey scope, density, and methodology, as well as confirmation of how reinstatement success will be defined and assessed. On this basis, the key parameters and assumptions remain Under Discussion. In any case, although refinements to survey methodology and baseline data would improve confidence in the assessment, the overall significance of effect is unlikely to change due to the size of the Order Limits and scale of agricultural land affected. Updated surveys would, however, improve accuracy in quantifying the total area of BMV land affected, which may currently be over or under-estimated</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Baseline Conditions</b>				
3.6.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Agriculture and Soils are presented in Section 6.5 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of the Outline Soil Resource Plan.</p>	<p>BDC does not agree that the baseline conditions and receptors for agriculture and soils have been characterised with sufficient confidence across the full extent of the Order Limits.</p> <p>As set out in the Council's Local Impact Report, ExQ1 submissions and Deadline 3 response, limitations in survey coverage, reduced soil pit excavation, reliance on auger data, limited PSD sampling and extensive use of predictive ALC modelling result in uncertainty regarding the accuracy of baseline soil classification and the true extent and distribution of BMV land.</p> <p>The Council welcomes the Applicant's commitment to undertake further post-consent soil surveys but notes that the scope, density and methodology for these surveys are not yet secured, and it is unclear whether all areas graded using predictive methods will be included. Until these matters are clarified and secured through the DCO, the baseline conditions and receptors remain Under Discussion.</p>	Under Discussion
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.6.7	Embedded mitigation	The embedded mitigation measures, which is that designed to be an inherent part of the Project for which development consent is sought, for	BDC acknowledges the embedded mitigation measures identified in the ES;	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>potential Agriculture and Soils effects are set out in Section 6.6 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. The embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects.</p> <p>The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of the Outline Soil Resource Plan.</p>	<p>however, the Council cannot agree their adequacy at this stage.</p> <p>As set out in the LIR, ExQ1 responses and Deadline 3 submission, limitations in the baseline soil data and uncertainties arising from predictive ALC modelling and reduced soil pit investigation mean that the effectiveness of embedded mitigation for soil protection, stripping, storage and reinstatement cannot be fully verified.</p> <p>Until the scope and methodology of post-consent soil surveys are secured and reinstatement success criteria confirmed, embedded mitigation remains Under Discussion.</p>	
3.6.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Agriculture and Soils effects during construction are summarised in Section 6.6 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b> and set out in the <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 Agriculture and Soils effects.</p> <p>As stated in <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b> and <b>7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-</b></p>	<p>BDC recognises the standard mitigation measures set out in the Outline CoCP; however, agreement cannot yet be reached on their adequacy.</p> <p>The Council's Deadline 3 response highlights that uncertainties in baseline soil characterisation — including auger-only data, limited PSD sampling and extensive use of predictive ALC grading — constrain confidence that standard mitigation (such as topsoil/subsoil handling and storage protocols) will be effective across all areas affected.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>303]</b>, standard mitigation includes the requirement for a soil survey post-consent / pre-construction in the areas where a detailed ALC survey was not undertaken. These surveys would be undertaken in accordance with the Soil Survey Field Handbook and the revised ALC guidelines, with a survey density of at least one auger bore per hectare (or one per 100 m for linear schemes) where practicable. The soil survey, providing site-specific data, would further inform the final Soil Resource Plan, allowing mitigation measures such as soil handling and storage to be appropriately tailored and effective across all affected areas, even where initial baseline data was limited.</p>	<p>Standard mitigation measures therefore remain Under Discussion pending confirmation of minimum survey density, methodology and reinstatement benchmarks.</p>	
3.6.9	Additional mitigation	<p>The consideration of additional mitigation measures for Agriculture and Soils is presented in Section 6.6 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. No additional mitigation measures are proposed to minimise effects, other than the measures for handling organic-rich (peaty) soils, which are already set out within the standard mitigation Outline Soil Resource Plan (SRP) as part of the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p> <p>The post-consent / pre-construction soil surveys and the final Soil Resource Plan will define a site-specific baseline, including full soil profile data, and establish measurable reinstatement targets. These targets will be used to confirm successful reinstatement in practice, rather than relying solely</p>	<p>BDC notes the Applicant's position that no additional mitigation is required; however, the Council cannot agree this conclusion at this stage.</p> <p>As set out in the LIR and Deadline 3 submission, the uncertainties in baseline soils data and predictive ALC grading create corresponding uncertainty in whether the proposed embedded and standard measures will be sufficient to protect soil function and BMV land quality. Reinstatement success criteria have not yet been confirmed, and the Soil Resource Plan does not secure the scope or density of necessary post-consent surveys.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		on returning land to the same ALC class, which may mask sub-grade variations in soil condition.	Until these matters are resolved, BDC considers the need for additional mitigation to remain Under Discussion.	
<b>EIA – Assessment Conclusions</b>				
3.6.10	Construction effects	<p>The assessment of effects during construction for Agriculture and Soils is presented in Section 6.7 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>The construction of temporary haul roads and storage of excavated materials is detailed within <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b> with an illustrative detail showing a typical haul road cross section with separated topsoil and subsoil storage included in <b>2.6.3 Design and Layout Plans - Traffic and Transport [APP-043]</b>.</p> <p>Haul roads need to be routed adjacent to the proposed works (e.g. the overhead line and underground cable alignments). The haul roads have been routed, where practicable, to minimise impacts on agricultural land (including known private drainage measures), hedgerows and trees but without significantly increasing the route length (which adds additional stone and therefore vehicle movements) and taking cognisance of the above constraint. Details regarding vegetation clearance requirements for the haul road are in paragraph 4.8.37 to 4.8.41 of <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b>.</p>	<p>BDC does not agree that the ES presents a sufficiently reliable assessment of construction effects on agricultural land and soils.</p> <p>As set out in the Council's LIR, ExQ1 responses and Deadline 3 submission, uncertainties in baseline soils information, including the extent of detailed ALC survey coverage, reliance on auger-only data, limited PSD sampling and extensive use of predictive ALC modelling, affect confidence in the magnitude and significance of construction-phase impacts.</p> <p>The effectiveness of soil stripping, handling, storage and reinstatement measures cannot be fully verified while key parameters such as soil structure, horizon characteristics, stone content and BMV land extent remain uncertain across parts of the Order Limits.</p> <p>The Council also notes that reinstatement success criteria have not been clearly defined, including whether land is to be restored to its pre-construction ALC grade, creating further uncertainty</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The Applicant continues to engage and discuss site-specific constraints relevant to the detailed design and construction methodology with affected landowners.</p> <p>The post-consent / pre-construction soil surveys and the final Soil Resource Plan will define a site-specific baseline, including full soil profile data, and establish measurable reinstatement targets. These targets will be used to confirm successful reinstatement in practice, rather than relying solely on returning land to the same ALC class, which may mask sub-grade variations in soil condition.</p>	<p>regarding long-term agricultural productivity.</p> <p>Accordingly, BDC considers the assessment of construction effects to be Under Discussion pending clarification and securing of the post-consent soil survey commitments and reinstatement requirements.</p> <p>In any case, even with improved survey data, the overall significance of construction effects is unlikely to change owing to the scale of agricultural land affected. However, better baseline information is necessary to ensure that the ES does not over- or under-estimate the area of BMV land impacted and to support effective reinstatement</p>	
3.6.11	Operational (and maintenance) effects	<p>The assessment of effects during operation and maintenance for Agriculture and Soils is presented in Section 6.7 of <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>. The assessment of effects during operation and maintenance presented is considered appropriate.</p>	<p>BDC does not agree that the ES provides a sufficiently reliable assessment of operational or maintenance effects on agricultural land and soils.</p> <p>As set out in the Council's LIR, ExQ1 submissions and Deadline 3 response, uncertainty in baseline soil characterisation — including the extent and distribution of BMV land and the limitations of predictive ALC modelling — affects confidence in how land productivity and soil quality will recover post-construction.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>The Council also notes that reinstatement success criteria have not been clearly defined, including whether land will be restored to its baseline ALC grade. Without confirmation of long-term monitoring, aftercare and remedial measures where reinstatement is unsuccessful, the operational phase effects remain uncertain.</p> <p>Accordingly, operational and maintenance effects on agricultural land and soils remain Under Discussion pending further clarification and secured commitments on reinstatement and long-term soil condition monitoring.</p> <p>While the overall significance of operational effects is not expected to change, improved soil data would refine the accuracy of BMV land take estimates and strengthen confidence in long-term reinstatement outcomes. The Council considers that reinstatement commitments should be secured through an updated Outline Soil Resource Plan to address this.</p>	

**EIA – Cumulative Impact Assessment Conclusions**

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

3.6.12	Outline CoCP	<p>The draft <b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all relevant mitigation measures specified in <b>6.6 Environmental Statement Chapter 6 -</b></p>	<p>BDC acknowledges that the Outline Code of Construction Practice sets out soil handling and protection measures relevant to agriculture and soils. However,</p>	<p><b>Under Discussion</b></p>
--------	--------------	--	---	--------------------------------

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Agriculture and Soils [APP-138]</b> and is appropriate for managing construction impacts from the Project on Agriculture and Soil receptors.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of the Outline Soil Resource Plan.</p>	<p>the Council cannot agree that the CoCP provides sufficient certainty at this stage. As set out in the Council's LIR, ExQ1 responses and Deadline 3 submission, limitations in baseline soils data, including reliance on predictive ALC modelling, reduced soil pit excavation, and limited PSD sampling, create uncertainty regarding the adequacy of the soil-related provisions within the CoCP. The Council also notes that key aspects of soil management, including minimum post-consent survey density, methodology and reinstatement success criteria, are not yet secured.</p> <p>Until these matters are clarified and reflected in the CoCP or secured through the DCO, this item remains Under Discussion.</p>	

## 3.7 Noise and Vibration

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.7.1	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>	BDC noted in their feedback dated 19 December 2025 noted that they agree policy and legislation is relevant and considered within the assessment.	Agreed
<b>EIA – Approach and Methods</b>				
3.7.2	Study area	The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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
3.7.3	Data sources	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> .	BDC noted in their feedback dated 19 <sup>th</sup> December 2025 noted that they BDC's position same as 3.5.2.	Agreed
3.7.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping</b>	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>Report and Scoping Opinion received from the Planning Inspectorate.</p>	
3.7.5	<p>Key parameters and assumptions</p>	<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>Further details on noise reduction, including parameters and assumptions can be found in Section 4.12 'Noise and Vibration' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>BDC does not agree that the key parameters and assumptions used in the Noise and Vibration assessment represent a robust or reliable worst-case scenario. As evidenced in ES Chapter 14, many of the assumptions that underpin the assessment depend on generic embedded mitigation or assumed Best Practicable Means (BPM), without demonstrating that the predicted reductions (typically 5–20 dB) can be achieved in practice across all construction activities and working environments. This is a fundamental concern, particularly as the ES identifies more than 140 receptors experiencing significant adverse effects prior to mitigation during daytime construction works, and multiple receptors during night-time construction.</p> <p>BDC also notes that ES Chapter 14 confirms that the assessment is based on indicative design, with many mitigation decisions deferred to the Main Works Contractor under the future Noise and Vibration Management Plan. This deferral compounds the uncertainty around whether the assumptions can be delivered in practice. Furthermore, the flexible Limits of Deviation introduce the real possibility that construction works may be located closer to sensitive receptors than modelled, potentially</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>increasing noise impacts beyond those assessed.</p> <p>BDC additionally maintains concerns that the ES assumptions around extended working hours, including evenings, nights, weekends and bank holidays, are not supported by clear evidence that adverse impacts can be avoided.</p> <p>Key requested information— including receptor-specific BPM proposals, further detail on construction compound noise controls, and justification of BPM reduction values—remains outstanding, and no further technical discussions have taken place since January 2026.</p> <p>Accordingly, BDC is unable to agree that the key parameters and assumptions presented in ES Chapter 14 are appropriate or sufficiently evidenced at this stage.</p>	
<b>EIA – Baseline Conditions</b>				
3.7.6	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>BDC noted in their feedback dated 19<sup>th</sup> December 2025 noted that they agree baseline conditions and receptors are considered appropriate.</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 Noise and Vibration effects, are set out in Section 14.6 of <b>6.14</b></p>	<p>BDC does not agree that the embedded mitigation measures identified in ES Chapter 14.6 are, at this stage, appropriately</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>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>demonstrated or sufficient to ensure that significant adverse noise and vibration effects will be avoided.</p> <p>As set out in the Local Impact Report (REP1-148) and other deadline submissions, BDC is concerned that the ES relies heavily on embedded mitigation and assumed Best Practicable Means (BPM) reductions, including indicative attenuation values of 5–20 dB, without providing evidence that these reductions can realistically be achieved across the full range of construction activities and working scenarios. The Council notes that these assumptions are particularly critical in areas where the ES predicts large or medium adverse effects prior to mitigation—including along haul roads, pylon construction sites and trenchless crossings.</p> <p>BDC also considers that the embedded mitigation measures do not sufficiently address the additional noise risks associated with:</p> <ul style="list-style-type: none"> <li>• Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed;</li> <li>• Extensive proposed working hours, including nights, weekends and bank holidays;</li> <li>• The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures.</li> </ul>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>The ES repeatedly assumes that BPM will reduce impacts to below significant levels but does not set out enforceable embedded mitigation measures to ensure this outcome. BDC considers this to be a key uncertainty in the noise evidence base, particularly as no detailed or receptor-specific BPM package has been secured through the DCO at this stage.</p> <p>BDC therefore maintains that embedded mitigation, as currently defined, is not sufficiently evidenced or secured to conclude that residual noise effects are “not significant”.</p> <p>Further clarification, enforceable mitigation commitments and additional detail in the Noise and Vibration Management Plan (NVMP) will be required before this matter can be agreed.</p> <p>Accordingly, this matter remains Not Agreed and under further discussion.</p>	
3.7.8	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 the <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>BDC acknowledges that the Outline CoCP identifies a range of standard noise and vibration mitigation measures, including general Best Practicable Means (BPM) controls, equipment selection, screening, acoustic enclosures and site management measures. However, BDC does not agree that these standard measures, as currently described, are sufficient to demonstrate that significant effects can be avoided.</p> <p>As set out in the LIR and other deadline submissions, the ES relies heavily on standard BPM measures to reduce large numbers of pre-</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>mitigation significant effects, yet provides no receptor-specific commitments, no secured performance standards, and no evidence that the assumed attenuation values (typically 5–20 dB) can be achieved consistently across the varied construction activities and extensive working hours proposed.</p> <p>BDC also notes that the standard mitigation measures are not fully secured at DCO stage, as the detailed Noise and Vibration Management Plan and specific mitigation packages are deferred to the Main Works Contractor. This significantly limits BDC's confidence that the standard measures, as outlined, will be sufficient to prevent significant adverse effects in practice.</p> <p>Accordingly, this matter remains under discussion, pending the provision of further detail, clearer commitments, and a mechanism to ensure that standard mitigation will be applied effectively and consistently across the route.</p>	
3.7.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC acknowledges that ES Chapter 14 identifies no additional mitigation beyond the embedded and standard measures already described. However, as set out in the LIR and subsequent deadline submissions, BDC remains concerned that the ES relies heavily on assumed BPM reductions and future contractor-stage mitigation to address large numbers of pre-mitigation significant effects.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>Given the uncertainties in the noise assessment methodology, the lack of secured receptor-specific mitigation, and the risks associated with flexible working hours and Limits of Deviation, BDC is not yet satisfied that no additional mitigation will be required in practice. This matter therefore remains under discussion pending further evidence and clarification from the Applicant.</p>	

### EIA – Assessment Conclusions

3.7.10 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. Although working periods outside of the 'daytime' periods identified in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, as detailed in Section 4 of <b>6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]</b> are more sensitive to noise the 'daytime' period (hence their lower threshold for potential significant effects), works during these periods would not directly lead to a significant adverse effect. Consideration of the sensitivity of the working period would be required as part of the application of Best Practicable Means (BPM) as per commitment NV01 within the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p>	<p>BDC does not agree with the Applicant's conclusion that significant adverse construction noise and vibration effects are unlikely to occur. As set out in the Local Impact Report (REP1-148), BDC considers that the working hours proposed—07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and Public Holidays, plus up to an additional hour either side for start-up and close-down—are excessive and offer insufficient respite for Noise Sensitive Receptors (NSRs). Requirement 7 of the draft DCO, when combined with Requirement 7(5) start-up/close-down provisions and Requirement 7(4) allowances for activities outside core hours, creates a 16 hour daily operational envelope with no enforceable upper noise limit during those periods. This substantially increases the likelihood of material adverse effects on residential amenity,</p>	Under Discussion
-----------------------------	--	---	------------------

ID	Matter	National Grid’s Position	Braintree District Council’s Position	Status
		<p>The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are:</p> <ul style="list-style-type: none"> <li>Monday – Friday: 0700 to 1900</li> <li>Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700</li> </ul> <p>Details relating to the proposed construction working hours and any associated restrictions are contained within <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>3.1 Draft Development Consent Order [APP-056]</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 construction working hours set out in <b>3.1 Draft Development Consent Order [APP-056]</b> define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely</p>	<p>health and wellbeing. BDC remains concerned that weekend and Bank Holiday construction—even if not continuous—has not been robustly assessed in terms of community impact and may understate the true significance of effects. BDC also notes that ES Chapter 14 identifies large numbers of receptors experiencing significant effects prior to mitigation, and that the conclusion of “no significant residual effects” relies heavily on assumed BPM reductions and unspecified contractor-stage measures, without secured, receptor-specific mitigation. The ES acknowledges that assessments are indicative and that mitigation is to be developed later, further undermining confidence in the conclusion.</p> <p>No further technical discussions on noise have occurred since January 2026, and BDC continues to request outstanding evidence, including justification for BPM attenuation assumptions, details of compound-specific mitigation, and confirmation of how noise for extended-hour working will be monitored and controlled.</p> <p>Accordingly, BDC cannot agree that the ES demonstrates that construction noise and vibration impacts will be not significant, and this matter remains under discussion.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p> <p>The inclusion of Sundays and Bank Holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer term exposure to construction impacts. A blanket prohibition on Sundays/bank holidays would materially harm the deliverability of this Critical National Priority (CNP) project.</p> <p>The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project.</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in <b>7.2 Outline Code of Construction Practice [REP3-025]</b>, significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(a) (Construction Management Plans) of <b>3.1 Draft Development Consent Order [APP-056]</b> within the final Code of Construction Practice.</p>		
3.7.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) 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 operation (and maintenance) presented is considered appropriate.</p> <p>The Applicant agrees to continue engaging with BDC regarding operational noise, including review of detailed operational noise assessments and finalised mitigation proposals where appropriate.</p>	<p>BDC acknowledges that no major concerns have been identified at this stage in relation to operational or maintenance noise and vibration, and that the ES predicts negligible to minor effects once embedded design mitigation is applied. Unlike the construction phase, operational noise is not anticipated to give rise to significant impacts within Braintree District.</p> <p>However, BDC notes that the ES assessment is indicative and based on early-stage design information, with detailed substation plant selection, siting, screening, and acoustic design to be confirmed during the detailed design phase. The Council therefore requires continued engagement and review of the detailed operational noise assessments and finalised mitigation proposals to ensure that operational effects remain acceptable.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			Accordingly, while BDC has no substantive objections in principle, this matter remains under discussion pending further detailed design information.	
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.7.12	Outline CoCP	<p>The Outline CoCP 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>Meeting held on 9th October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>BDC acknowledges the iterative development of the Outline CoCP and the Applicant's engagement through 2024 and 2025. However, BDC does not agree that the Outline CoCP, in its current form, provides sufficient clarity or secured commitments to demonstrate that construction noise and vibration impacts will be adequately controlled.</p> <p>As highlighted in BDC's LIR (REP1-148) and subsequent deadline submissions, the Outline CoCP relies heavily on generic Best Practicable Means (BPM) without specifying receptor-specific measures, enforceable performance standards, or guaranteed noise limits during extended working hours. The ES (Chapter 14) identifies numerous significant adverse construction noise effects before mitigation, and the Outline CoCP does not yet give BDC confidence that these will be reduced to acceptable levels in practice.</p> <p>BDC's 27 November 2024 comments on the first iteration of the CoCP requested further detail on construction noise controls, monitoring procedures, and clear methodologies for ensuring compliance. These points remain</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>outstanding, and BDC has not yet received comments or clarification on the 2nd iteration. In BDC's feedback of 19 December 2025, the Council confirmed that while the structure of the outline management plans is broadly appropriate, substantial issues remain unresolved regarding:</p> <ul style="list-style-type: none"> <li>• the practical enforceability of BPM;</li> <li>• noise limits during start-up/close-down periods;</li> <li>• the absence of specific mitigation for high-risk locations;</li> <li>• controls for weekend and Bank Holiday working;</li> <li>• monitoring, escalation and compliance processes.</li> </ul> <p>Because these issues directly affect BDC's ability to conclude that construction impacts can be mitigated effectively, this matter remains under discussion pending further detail and revision.</p>	
<b>Other matters as required</b>				
3.7.13	NSR off Old Mill Lane	<p>The assessment of weekend construction works within <b>6.14 Chapter 14 - Noise and Vibration [APP-256]</b> includes two key assumptions which means this interpretation is not applicable in practice.</p> <p><b>1. Mitigation is assumed for weekend works</b></p>	<p>BDC does not agree that the Applicant has demonstrated that significant adverse construction noise effects can be avoided at the NSR off Old Mill Lane (Threadkells), or at similar rural receptors along the route.</p> <p>As set out in BDC's Relevant Representations, LIR and subsequent deadline submissions, the</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Weekend and bank holiday periods are more sensitive than weekdays, reflected in the lower threshold of 55 dB LAeq,T (compared to 65 dB for weekdays). The weekday assessment assumes no mitigation as a worst-case to identify 'hot-spots' where mitigation is required to avoid significant adverse effects. Applying this assumption to weekends would overstate impacts. Instead, the weekend assessment assumes a reasonable 10 dB attenuation from mitigation, meaning the same 'hot-spot' locations identified for weekdays without mitigation are the same as those for weekends with indicative mitigation (because the difference between the thresholds is also 10 dB).</p> <p><b>2. Temporal restrictions are applied</b></p> <p>Where thresholds could still be exceeded with mitigation, temporal restrictions are considered as part of Best Practicable Means (BPM). This ensures that significant adverse effects do not occur during weekend periods.</p> <p>Implementing mitigation would ensure that significant adverse effects would not occur in this situation, or others like it, as follows:</p> <ul style="list-style-type: none"> <li>• The Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</li> <li>• Based on the outcome of these assessments, specific mitigation measures would be identified</li> </ul>	<p>ES identifies this property as experiencing a Medium magnitude construction noise impact prior to mitigation, with predicted levels for pylon construction of 60–66 dB LAeq,T at approximately 140 m from proposed Pylon TB78. Under BS 5228 Category A weekend thresholds (55 dB), this could amount to a Large magnitude effect (i.e., &gt; +5 dB above the threshold) during weekend periods. The same concern applies to other isolated rural receptors located in close proximity to proposed pylon locations.</p> <p>BDC is not satisfied with the Applicant's explanation that weekend assessments assume an automatic 10 dB attenuation to offset the lower threshold for significance. This assumption is unsupported, unsecured, and optimistic, representing neither a guaranteed nor evidenced reduction. As noted in the LIR, the ES relies heavily on theoretical BPM, rather than committed or receptor-specific measures, and does not demonstrate that such reductions can realistically be delivered across the range of construction activities.</p> <p>Similarly, BDC remains concerned that reliance on temporal restrictions to avoid significant weekend effects is not secured in the DCO or Outline CoCP. Temporal restrictions are presented as a discretionary BPM tool, rather than a fixed or enforceable mitigation commitment. As a result, the ES conclusion that</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – <b>(7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306])</b>).</p> <ul style="list-style-type: none"> <li>● Should the resultant construction noise levels exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), with the inclusion of all practicable mitigation measures, temporal restrictions would be required to either: <ul style="list-style-type: none"> <li>– Avoid works during that period at that location, or</li> <li>– If works during this period cannot be avoided, limit the duration of the works such that the effect is not significant.</li> </ul> </li> </ul> <p>Such situations may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the contractor and the local authority.</p>	<p>weekend impacts will not be significant is not robust.</p> <p>BDC also notes that the Applicant's reliance on contractor-stage detailed assessment (NV05) does not provide sufficient reassurance; the Council cannot rely on future method statements to address what is, on the face of the ES modelling, a potentially significant weekend impact at Threadkells and similar receptors.</p> <p>For these reasons, the Council maintains that the significance of weekend construction noise at this NSR—and potentially many others—has likely been understated, and that the ES analysis does not provide sufficient evidence to conclude that significant adverse effects can be avoided.</p>	
3.7.14	LOD requirements	<p>The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on Figure 4.1: Proposed Project Design of the ES <b>(6.4.F1 Environmental Statement (ES) Figure 4.1: Proposed Project Design [APP-133])</b>.</p>	<p>BDC does not agree that the Environmental Statement has robustly assessed the worst-case construction noise and vibration impacts arising from the full extent of the Limits of Deviation (LoD). As highlighted in the LIR and subsequent deadline submissions, the ES</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>However, the Limit of Deviation (LoD) for overhead lines (and associated pylons) is considered in Section 9 of <b>6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]</b>. It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy Statement for England, the NPPF and Planning Practice Guidance for Noise).</p> <p>It should also be considered that the LoD includes the conductors and the associated conducted swing, as shown in <b>2.6.2 Design and Layout Plans – Overhead Lines [APP-042]</b>. As such, in practice, pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at ‘bends’ in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD.</p> <p>The LoD was reviewed through the EIA process when producing the ES and there are no locations where movement towards the edge of the LoD, and towards NSRs, would lead to any likely significant</p>	<p>construction noise assessment appears to be based on indicative pylon locations shown on the Works Plans, rather than the maximum permissible envelope within which pylons may be constructed under Article 5 of the draft DCO.</p> <p>This approach fails to test scenarios where pylons or construction compounds could be located considerably closer to Noise Sensitive Receptors (NSRs) — in some cases by up to 50 metres or more — should the LoD be exercised. Such proximity changes could materially increase noise levels, particularly during pylon foundation works, haul road construction, or heavy plant operation. BDC therefore considers that the ES does not present a credible worst-case assessment, and that construction noise effects at NSRs (including Threadkells on Old Mill Lane) may be significantly understated.</p> <p>BDC also remains concerned that the Applicant's reliance on future contractor-stage assessments (NV05) and discretionary BPM cannot substitute for a robust ES-stage evaluation. The ES assumes that any additional noise impacts arising from LoD movement will be mitigated, but provides no evidence that such mitigation is technically feasible, secured, or capable of preventing significant adverse effects at all locations. This is particularly problematic in rural settings where isolated receptors have low background noise levels,</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>adverse effects with the implementation of standard mitigation measures.</p> <p>Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the <b>7.2 Outline Code of Construction Practice [REP3-025]</b> for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – <b>(7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306])</b>).</p>	<p>making them more susceptible to adverse effects.</p> <p>As a result, BDC cannot agree that LoD-enabled movement “would not lead to significant adverse effects”, nor can it accept that worst-case construction noise impacts have been assessed adequately. This matter remains under discussion pending further evidence demonstrating that the full LoD envelope has been assessed and that enforceable mitigation exists to manage any increase in impacts.</p>	
3.7.15	Noise limits	<p>There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in Section 4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>.</p>	<p>BDC acknowledges that there are no statutory construction noise limits, but does not agree that reliance solely on BS 5228 'ABC' threshold assessments and discretionary BPM is sufficient to protect Noise Sensitive Receptors (NSRs) during periods outside core working hours.</p> <p>As set out in the LIR and subsequent deadline submissions, BDC remains particularly concerned that the draft DCO permits start-up and close-down activities up to one hour either</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>side of core hours, with no enforceable noise limit during these periods. In rural areas with low background noise levels, even preparatory or plant-movement activities can result in noticeable and adverse disturbance. The ES does not provide a robust assessment of the likely noise levels associated with these activities, nor does it secure mitigation to ensure that impacts will fall below the Lowest Observed Adverse Effect Level (LOAEL).</p> <p>BDC therefore maintains that a specific, enforceable noise limit should apply to start-up and close-down periods at the nearest NSRs. Consistent with established precedent in the Bramford to Twinstead DCO (Requirement 7(4)), BDC considers that a limit of 50 dB LAeq,T during these peripheral working periods is both reasonable and necessary to safeguard residential amenity. This is particularly important given the scale of works, the extensive working-hour envelope, and the absence of guaranteed BPM reductions.</p> <p>Without such a limit being secured in the DCO, BDC cannot agree that noise effects associated with early and late working have been adequately mitigated or assessed. This matter therefore remains under discussion, pending Applicant confirmation of a secured noise limit approach.</p>	
3.7.16	Piling operations	Such a restriction should be borne out of assessment outcomes, to avoid significant adverse	BDC does not agree that Requirement 7(2) should restrict only percussive piling. As set out	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>effects rather than blanket restrictions which in some cases may be unnecessary. The assessment of construction noise and vibration detailed in <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> indicates that there are no likely significant adverse effects from any construction activity, including piling, with the implementation of best practicable means (BPM) to reduce effects.</p> <p>Any restrictions, where deemed appropriate, will be borne from assessment outcomes secured via commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014] and mitigation measures will be considered as appropriate to avoid significant adverse effects and reduce adverse effects. Such mitigation measures may include temporal restrictions as part of best practicable means secured via commitments NV01, NV02 and NV03 of 7.2 Outline Code of Construction Practice [REP2-014].</p>	<p>in the Council's Relevant Representations, LIR, and subsequent deadline submissions, all piling operations have the potential to generate material noise and vibration impacts, particularly at sensitive rural receptors located close to proposed pylon foundations.</p> <p>The ES (Chapter 14) identifies piling as one of the construction activities with potential to generate significant levels of vibration and high noise outputs, depending on ground conditions and technique. Although the Applicant assumes BPM will prevent significant effects, the ES provides no secured, receptor-specific evidence that BPM would reliably reduce impacts across all piling types, durations, and locations.</p> <p>BDC therefore considers it essential that all forms of piling are subject to the same working-hour controls as percussive piling, consistent with established precedent in the Bramford to Twinstead DCO, where Requirement 7(4) applied uniformly to all piling methods. This is necessary to ensure clarity, enforceability, and adequate protection for Noise Sensitive Receptors (NSRs), especially in rural areas with low ambient sound levels.</p> <p>BDC also notes the ES relies on future contractor-stage assessments (NV05) and BPM assumptions rather than securing firm mitigation now. Until the Applicant demonstrates, through detailed and secured commitments, that non-percussive piling poses no risk of significant adverse noise or vibration</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>effects, BDC cannot accept a narrower restriction.</p> <p>Accordingly, BDC maintains that Requirement 7(2) must apply to all piling operations, not solely percussive piling.</p>	
3.7.17	Noise Screening	<p>This comment relates to the inclusion of screening in some plant items in Appendix 14.1: Construction Noise and Vibration Data of the ES <b>(6.14.A1 Environmental Statement Appendix 14.1 – Construction Noise and Vibration Data [APP-257])</b>. It is correct that a 10 dB reduction was applied to some fixed plant items, such as generators. However, the inclusion of this screening mitigation does not affect the overall activity noise level. This is because noise from items such as generators, even in an unmitigated scenario, is substantially lower than that from other plant associated with the same activities, and therefore does not materially increase the combined noise level. Additionally, the worst-case activity for each construction phase is considered in the assessment. The outcome is therefore the same irrespective of the inclusion of this screening. However, such items would be expected to be screened, but the outcome of the assessment is not dependent on that being the case.</p>	<p>BDC does not agree that the treatment of screening within the ES is sufficiently clear or robust. As set out in the Council's Relevant Representations and LIR, there is a direct inconsistency between:</p> <ul style="list-style-type: none"> <li>• Appendix 14.1, which applies a 10 dB screening reduction to certain fixed plant items, and</li> <li>• ES Chapter 14, paragraph 14.7.6, which states: <i>"for the purposes of this assessment, no specific mitigation (such as screening) is included."</i></li> </ul> <p>This contradiction creates uncertainty about whether screening has been assumed in the construction noise predictions, and, if so, whether the ES is relying on mitigation that is neither committed nor secured.</p> <p>BDC also notes that the ES provides no detail on:</p> <ul style="list-style-type: none"> <li>• how screening would be designed,</li> <li>• where it would be deployed,</li> <li>• how a 10 dB reduction would be reliably achieved in practice, or</li> </ul>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<ul style="list-style-type: none"> <li>how screens would be maintained throughout the construction programme.</li> </ul> <p>Given that ES conclusions for many receptors depend on assumed BPM reductions, BDC considers it essential that all screening assumptions used in the noise modelling are explicitly stated, justified, and secured. Without this clarity, BDC cannot confirm that the ES represents a robust worst-case assessment.</p> <p>This matter remains under discussion pending clarification of screening methodology, deployment criteria, and the extent to which screening has been included in the ES modelling.</p>	

### 3.8 Health and Wellbeing

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

### 3.9 Historic Environment

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.8.1	Policy and legislation (Built Heritage)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>6.2</b>	[Place Services Built Heritage on behalf of Braintree District Council] Based on a further review of the identification and assessment of the	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> 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>All non-designated heritage assets were assessed to determine their value in accordance with the <b>Scoping Report [APP-288] to [APP-296]</b>, the <b>Scoping Opinion [APP-297]</b> and the methodology set out in <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 states at paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES and in</p>	<p>value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209] we are able to agree this matter.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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.		
3.8.2	Policy and legislation (Archaeology)	<p>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> 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>	Place Services (Archaeology) on behalf of Braintree District Council is currently reviewing the relevant documentation. The ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance.	Agreed
<b>EIA – Approach and Methods</b>				
3.8.3	Study area	<p>The study area was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <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
3.8.4	Data sources (Built heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of <b>6.11</b>	This matter is agreed.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>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 primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. <b>The Historic Environment Baseline Report (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209])</b> is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.</p>		
3.8.5	Data sources (archaeology) - Desktop	Sufficient desktop 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>	Braintree District Council has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026.)	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.6	Data sources (archaeology) – survey data	<p>Sufficient 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>Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the <b>Supplementary Environmental Information [AS-068 to AS-083]</b>. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project.</p> <p>Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of <b>Supplementary Environmental Information [AS-068 to AS-083]</b>. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.</p>	<p>There has been sufficient desktop data collected, however, the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review.</p> <p>This matter remains under discussion.</p>	Under Discussion
3.8.7	Assessment methodology (Built heritage)	The <b>6.20 Scoping Opinion [APP-297]</b> stated: <i>“The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed</i>	The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><i>assessment methodology with relevant local planning authorities.”</i></p> <p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024.</p> <p>BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of 'high value' could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. The Applicant will consider this during the update of the Baseline Report for DCO submission.</p> <p>It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion.</p> <p>Historic Environment Viewpoints feedback will be taken into account for the assessment.</p> <p>The Applicant position regarding non-designated heritage assets is as outlined in section 3.7.1 (Policy and Legislation) above.</p>	<p>BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of 'high value' could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. National Grid will consider this during the update of the Baseline Report for DCO submission.</p> <p>It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion.</p> <p>Historic Environment Viewpoints feedback received on 4<sup>th</sup> March 2025 from Essex Place Services (EPS).</p> <p>As agreed in the meeting in January 2026, this matter is agreed.</p>	
3.8.8	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b>	BDC is in agreement with this matter.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.		
3.8.9	Key parameters and assumptions (Built heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> . The key parameters and assumptions presented are considered appropriate.  In March 2025, The Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.	BDC is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains."  As agreed in the meeting in January 2026, this matter is agreed.	Agreed
3.8.10	Key parameters and assumptions (Archaeology)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> . The key parameters and assumptions presented are considered appropriate.  Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the Supplementary Environmental Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project. Archaeological trial trenching had been	BDC (Archaeology) is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that " <i>The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.</i> "	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>completed for 89% of priority areas at the point of submission of Supplementary Environmental Information [AS-068 to AS-083]. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.</p>		
<b>EIA – Baseline Conditions</b>				
3.8.11	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. Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).</p>	This matter is agreed.	Agreed
3.8.12	Baseline conditions and receptors (Archaeology)	<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. February 2025, the Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</p>	ECC agreed this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.8.13	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><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>BDC agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is most relevant in areas of underground cable where there will be an impact on archaeological remains.</p> <p>Further time is needed to review 5.15 Design Development Report [APP-122] but we note this refers only to changes requested to the route alignment which were made before the final ES.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.14	Standard mitigation (Built heritage) – H06	<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 the <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>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 the <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>. Specifically, this means:</p> <p>Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature.</p> <p>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists.</p>	<p>H06 – Standard Mitigation (Reinstatement of Historic Landscape Features)</p> <p>BDC agrees that the principles in H06 are appropriate, and welcomes the commitment to reinstate hedgerows, boundaries, walls and other historic landscape features in a manner sensitive to local character. However, BDC emphasises that implementation must be fully secured and enforceable through the final CoCP and associated detailed documents to ensure reinstatement reflects historic form, materials and landscape character, as required by the LIR.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<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>		
3.8.14a	Standard mitigation (Built heritage) – H07	<p>Regarding H07 <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (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> <p>Commitments NV01, NV02, NC03, NV04, NV05, and NV20 in <b>7.2 Outline Code of Construction Practice [REP3-025]</b> all address points regarding vibration.</p>	<p>H07 – Vibration and Heritage-Sensitive Monitoring / Response Measures</p> <p>BDC does not agree that H07 is yet adequate. While the vibration assessment identifies only one designated asset outside Braintree (Little Bromley War Memorial), BDC considers that the mitigation commitment must be applicable scheme-wide because:</p> <ul style="list-style-type: none"> <li>• Non-designated but locally important historic buildings may still be sensitive to vibration;</li> <li>• the effects of Limits of Deviation (LoD) have not been assessed in sufficient detail in relation to above-ground heritage settings; and</li> <li>• members of the public, including owners of historic or older buildings, require a clear, accessible mechanism to report concerns and obtain timely investigation.</li> </ul> <p>BDC therefore seeks expansion of H07 to include:</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<ul style="list-style-type: none"> <li>• a public-facing contact mechanism (e.g., hotline/email) for building owners concerned about construction vibration;</li> <li>• a clear process for rapid investigation and communication of results;</li> <li>• confirmation that LoD-enabled changes in construction proximity will trigger a review of heritage-sensitive vibration risks.</li> </ul> <p>BDC also notes that the Applicant's reliance on contractor-stage detailed assessments reduces confidence that H07, as currently drafted, will provide sufficient protection or reassurance to building owners. This matter therefore remains under discussion.</p>	
3.8.15	Standard mitigation (Archaeology)	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 the <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.	BDC agreed this matter during call held January 2026.	Agreed
3.8.16	Additional mitigation	The consideration of additional mitigation measures is presented in Section 11.6 of <b>Chapter 11 (Historic Environment)</b> of the <b>ES</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The Applicant is currently preparing an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.</p>	<p>BDC noted during call in January 2026 that this matter is not relevant for Built Heritage.</p>	
<b>EIA – Assessment Conclusions</b>				
3.8.17	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</p>	<p>This matter is agreed.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		assessment of effects during construction presented is considered appropriate.		
3.8.18	Construction effects (archaeology)	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.	This section is currently under review (BDC Archaeology) Email 4 <sup>th</sup> Nov 2024 - Archaeology – consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. Email 6 <sup>th</sup> Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	Agreed
3.8.19	Operational (and maintenance) effects (Built heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	Agreed
3.8.20	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.8.21	Outline CoCP	<p>The <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.</p> <p>Meeting held on 9<sup>th</sup> October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29<sup>th</sup> January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Noting BDC's comments on H07 above, The Applicant proposes the oCoCP in relation to archaeology is agreed.</p>	<p>BDC confirms that the Outline Code of Construction Practice (CoCP) contains the necessary standard mitigation measures for archaeology, as set out in ES Chapter 11. The Council is satisfied that archaeological matters are now agreed, subject to detailed implementation through the final Written Scheme of Investigation and contractor-stage plans.</p> <p>For built heritage, agreement to this is subject to improving measure HO7 as per the "standard mitigation" section above.</p>	Under Discussion
<b>Other matters as required</b>				
3.8.22	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and	<p>The Applicant shared overarching WSIs in March – June 2024 and December 2024.</p> <p>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	<p>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	archaeological trial trenching.			
3.8.23	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p> <p>There are still addenda to site specific WSIs forthcoming that have yet to be issued.</p>	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed
3.8.24	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required.</p> <p>The Applicant issued the Outline AMS-OWSI for the post-consent stage of the project in April 2025.</p> <p>The Applicant is currently preparing an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review.</p>	<p>BDC considers the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) to be broadly appropriate in structure and consistent with established NSIP practice. The Council recognises that the staged approach to archaeological evaluation and mitigation presented in the ES is proportionate and aligns with national guidance. However, the AMS-OWSI remains under review, and BDC is not yet able to confirm agreement pending further detailed examination of the April 2025 iteration, including the scope of evaluation, methodology, and interfaces with the detailed post-consent WSI. As identified in the LIR, BDC expects continued engagement with the Applicant to ensure that site-specific archaeological requirements—particularly in areas of elevated archaeological potential—are fully secured through the final WSI. Accordingly, this matter remains under discussion at this stage.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.8.25	Programme for completion of archaeological fieldwork	<p>A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

## 3.10 Landscape and Visual

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.9.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in <b>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>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that the correct guidance has been used and that this matter is agreed.</p>	Agreed
<b>EIA – Approach and Methods</b>				
3.9.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p>	Agreed
3.9.3	Data sources	<p>Sufficient desktop and survey data 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>.</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is agreed.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.9.4	Assessment methodology (including LVIA methodology and viewpoints)	<p>The outline methodology for assessing Landscape and Visual was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate and through subsequent thematic workshops</p> <p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28 November 2024 to follow up any additional changes to the assessment.</p> <p>The Applicant issued an update on LVIA Viewpoints and Methodology in March 2025.</p>	<p>The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p> <p>E-mail from BDC dated 8<sup>th</sup> October 2024 – stated some areas that are agreed, e.g. study area and general categories for visual susceptibility, methodology for ZTV mapping and viewpoint photography and photomontage creation. However, this e-mail also stated some areas of concern in relation to viewpoints and visual value.</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is agreed subject to matters surrounding residential assessment where further discussion is required.</p>	Agreed
3.9.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is agreed</p>	Agreed
<b>EIA – Baseline Conditions</b>				
3.9.6	Baseline conditions	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of <b>6.13 Environmental Statement Chapter</b></p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	and receptors	<b>13 - Landscape and Visual [APP-226]</b> . The baseline conditions and receptors presented are considered appropriate.	2026 and through comments provided on 19 <sup>th</sup> December 2025 that this matter is agreed	

### EIA – Embedded, Standard and Additional Mitigation Measures

3.9.7	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 and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p>	<p>BDC does not agree that the embedded mitigation presented in ES Chapter 13 is adequate, or that it is capable of preventing extensive, long-term, and in some cases severe landscape and visual harm across Braintree District. As set out in the Local Impact Report (REP1-148) and subsequent deadline submissions, the proposed embedded measures, principally routing choices, pylon design selection and limited micrositing flexibility, do not materially reduce the scale or significance of the impacts identified in the ES.</p> <p>BDC notes that the ES identifies widespread significant adverse effects on multiple Landscape Character Areas (LCAs), Visual Receptor Areas (VRAs), Public Rights of Way, rural settlements and highly valued countryside. These significant effects persist even after embedded mitigation has been applied, demonstrating that embedded measures are insufficient to address the magnitude of harm arising from the proposed overhead line.</p> <p>As such, BDC maintains that the embedded mitigation falls short of what is required to protect valued local landscapes, long-distance recreational routes and rural amenity sites.</p>	Not Agreed
-------	---------------------	--	--	------------

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.9.8	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 set out in the <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>BDC does not agree that the standard or additional mitigation measures set out in ES Chapter 13 and the Outline CoCP are adequate to address the extent and severity of the predicted landscape and visual effects. As stated in BDC's position on embedded mitigation, the Project would give rise to widespread and long-term significant adverse effects across multiple Landscape Character Areas, valued countryside, long-distance recreational routes and Visual Receptor Areas within Braintree District.</p> <p>The standard mitigation measures, primarily construction-stage good practice, vegetation management, temporary screening and reinstatement, do not materially reduce or offset these impacts. Likewise, the ES identifies no meaningful additional mitigation, and instead relies on the embedded design alone, despite the persistence of extensive significant effects. BDC therefore considers the mitigation hierarchy to have been inadequately applied, with only minimal measures brought forward despite the scale of residual harm.</p> <p>Accordingly, BDC maintains that both the standard and additional mitigation measures are not sufficient, and that greater use of alternative design approaches (including undergrounding) is required if significant landscape and visual harm is to be reduced. For these reasons, the matter remains Not Agreed.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.9.9	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 Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p> <p>The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	Not agreed- see above.	Not Agreed
<b>EIA – Assessment Conclusions</b>				
3.9.10	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>E-mail received from Suffolk County Council on 4 Nov 2024 suggested that concerns had been raised by a number of stakeholders (inc. BDC) regarding the lack of assessment for tree and hedgerow loss along the route.</p> <p>The Applicant can confirm that tree and hedgerow loss has been assessed as part of the assessment of effects on landscape character during construction and operation. This has been captured within the Arboricultural Impact Assessment and Ecology Biodiversity Net Gain assessment.</p> <p><b>Updated position (February 2026):</b></p>	<p>E-mail received on 4<sup>th</sup> Nov 2024 suggested that concerns had been raised by a number of stakeholders (inc. BDC) regarding the lack of assessment for tree and hedgerow loss along the route.</p> <p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is agreed upon receipt of the list of significant effects.</p> <p>This can now be agreed.</p>	Agreed


ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>The Landscape and Visual Impact Assessment (LVIA) set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and appendices [APP-228 to APP-232]</b> identifies significant adverse residual effects on landscape and visual receptors during construction. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following Visual Receptor Areas (VRA) are predicted to experience significant effects up to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham.</p> <p>Whilst during the iterative design process the Project has sought to minimise vegetation removal as far as practicable and to retain existing trees and woodlands wherever possible in accordance with paragraph 5.11.27 of NPS EN-1 (2024), vegetation loss will however result. The <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]</b> identifies all trees and hedgerows which have the potential to be affected (this includes the assessment categories Removed, Affected Managed and Potentially Affected) by the Project; assesses the preliminary impact of the Project; and recommends protection measures as necessary.</p>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.9.11	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><b>Updated position (February 2026):</b></p> <p>The LVIA set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and <b>appendices [APP-228 to APP-232]</b> identifies significant adverse residual effects on landscape and visual receptors during operation. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following Visual Receptor Areas (VRA) are predicted to experience significant effects up to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham.</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is agreed upon receipt of the list of significant effects. This can now be agreed.</p>	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.9.12	Outline CoCP	<p>The <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</p>	<p>BDC noted in the meeting to discuss the Statement of Common Ground on 2<sup>nd</sup> February 2026 and through comments provided on 19<sup>th</sup> December 2025 that this matter is still under discussion pending further review of the Outline CoCP.</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9 October 2024 to agree on the structure for the Outline CoCP. A further meeting was held on 29 January 2025 to address comments from stakeholders.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>Following review this is now agreed for landscape matters.</p>	
3.9.13	Outline LEMP	<p>The <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>BDC does not yet agree that the Outline LEMP provides an adequate or sufficiently detailed basis for managing the operational landscape and visual effects of the Project. As set out in the LIR, the Project gives rise to extensive and long-term significant landscape and visual harm, which cannot be meaningfully reduced without more robust, clearly defined and enforceable mitigation measures.</p> <p>The Outline LEMP remains overly generic, particularly in relation to aftercare and long-term management. BDC considers that the document provides insufficient detail on:</p> <ul style="list-style-type: none"> <li>• how reinstated or compensatory planting will be maintained;</li> <li>• the length and nature of aftercare responsibilities;</li> <li>• who will be responsible for delivery, monitoring and remedial works; and</li> </ul>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<ul style="list-style-type: none"> <li>• how successful establishment will be measured and enforced.</li> </ul> <p>Given the sensitivity of local landscapes and the significant residual effects identified in the ES, BDC requires a much clearer and more detailed approach to aftercare, establishment failure procedures, and responsibility for long-term maintenance. Without this, the outline LEMP does not provide confidence that the limited mitigation available will be delivered effectively or sustained over time.</p> <p>For these reasons, the Outline LEMP remains under discussion and is not yet agreed.</p>	
<b>Other matters as required</b>				
3.9.14	Residential Visual Amenity Assessment	<p><b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 &amp; APP-234]</b> was prepared in line with the Landscape Institute's 'Technical Guidance Note 2/19 Residential Visual Amenity Assessment'.</p> <p>Worst-case scenarios, where a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which is predominantly, but not always, the closest point to the property) have been considered in the RVAA.</p> <p>With regards to property E7 – West Ford Farm Cottage, the worst-case scenario would be the movement of pylon TB93 (currently proposed along the 'centreline of work' approximately 152 m from the property's garden and 157 m from its dwelling)</p>	<p>BDC does not agree with the Applicant's conclusions in the RVAA regarding residential visual amenity at properties E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm). While the RVAA identifies these receptors as those with potential to approach the residential visual amenity threshold, BDC remains concerned that the assessment does not incorporate a robust or realistic worst-case scenario, particularly in relation to the full extent of the Limits of Deviation (LoD) as drafted in the dDCO.</p> <p>The ES and RVAA present a narrow interpretation of "worst-case", based on movement of pylons within a limited portion of the LoD envelope. However, Article 5 of the draft DCO allows pylons to be moved anywhere within</p>	<b>Not Agreed</b>

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>to the closest point of the LoD from the dwelling (as shown on the Works Plans <b>(2.3 Works Plans - Section E [APP-021])</b>). This would make the pylon, instead, approximately 65 m from the property's garden and 60 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in BDC's Relevant Representation). In this worst-case scenario the Project would be appear closer (therefore larger) in the views experienced from the property, and the pylon would still be located within the field to the property's immediate north, but there would not be any additional impacts. Additionally, the property's northern boundary hedge and trees would still filter some views from the dwelling's ground floor windows and the garden's main patio area to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on West Ford Farm Cottage that would give rise to the 'residential visual amenity threshold' being breached.</p> <p>With regards to property E8 – Whiteheads Farm, the worst-case scenario would be the movement of</p>	<p>the Order Limits, including to locations substantially closer to residential boundaries than shown in the ES figures. In the case of both E7 and E8, the Order Limits extend up to the residential curtilage, meaning that re-positioning of pylons further northwest or southeast (depending on the pylon) could, in principle, place these structures significantly closer than the Applicant's presented "worst-case". This remains a material visual risk that has not been assessed or mitigated.</p> <p>BDC also does not accept the Applicant's assertion that such movements "would not result in any additional impacts." When pylons of 45–50 m height are moved materially closer to a dwelling, the resulting effect is not merely "larger in view", but potentially overbearing, encroaching, and visually dominant, particularly from primary living spaces, private gardens and outdoor amenity areas.</p> <p>The RVAA's dismissal of additional harm does not reflect the scale-sensitivity of these receptors or the very low baseline visual thresholds of rural residential properties.</p> <p>Furthermore, the RVAA places undue weight on existing vegetation as a long-term screening feature. Hedgerows and small trees described as "filtering" views are unlikely to provide meaningful visual mitigation of tall pylons at close proximity, especially in winter or following routine vegetation management within the operational corridor. The ES does not secure</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>pylon TB98 (currently proposed along the 'centreline of work' approximately 126 m from the property's garden and 158 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on the Works Plans <b>(2.3 Works Plans - Section E APP-021])</b>). This would make the pylon, instead, approximately 75 m from the property's garden and 100 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in Braintree District Council's Relevant Representation). In this worst-case scenario the Project would be appear closer (so larger) in the views experienced from the property, but there would not be any additional impacts. Additionally, the evergreen hedgerows along the property's north-east facing boundary would still filter some views from the dwelling's ground floor windows and the garden to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on Whiteheads Farm that would give rise to the 'residential visual amenity threshold' being breached.</p>	<p>preservation of these features, nor does it model scenarios in which LOD-enabled construction necessitates partial removal of boundary vegetation.</p> <p>BDC's overarching landscape position, set out in the LIR (REP1-148), emphasises that embedded mitigation is insufficient and that significant and long-term adverse visual effects remain widespread even where pylons are located at their indicative positions. This conclusion is reinforced, not reduced, when considering the potential for pylons to move closer to sensitive residential receptors under the generous LoD drafting.</p> <p>For these reasons, BDC cannot agree that the residential visual amenity threshold would not be breached at E7 or E8 under a credible worst-case scenario. The RVAA does not adequately assess or safeguard these receptors, and the matter therefore remains Not Agreed.</p>	

### 3.11 Socio-economics, Recreation and Tourism

Braintree District Council defer comments regarding Socio-economics, Recreation and Tourism to Essex County Council. Please find details of this in the Essex County Council Statement of Common Ground (document reference 5.9.3). The only comment Braintree District Council wish to make is that they share ECC’s view that a skills and tourism package is required to mitigate the impacts of the development. Something that would sit wholly within the remit of the planning application and not within community benefits. In response, the Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5. The Applicant will engage with the relevant local authorities on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record.

### 3.12 Cumulative Effects

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

ID	Matter	National Grid’s Position	Braintree District Council’s Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.10.1	Policy and legislation	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> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BDC noted in their feedback dated 19 <sup>th</sup> December 2025 noted that as far as they can see, all relevant legislation and guidance has been complied with.	Agreed
<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] to [APP-296]</b> and the	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p><b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>		
3.10.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p> <p><b>6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]</b> provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate).</p>	<p>Following further review of the long and short lists, BDC does not agree that the cumulative effects assessment presented in ES Chapter 17 represents a complete or robust evaluation of cumulative impacts. As set out in the Local Impact Report and BDC's Deadline 2 and 3 submissions, the long list and short list of other developments used in the ES rely on a cut-off date of 1 April 2025, meaning a number of planning applications and emerging schemes identified by BDC have not been included in the assessment. As a result, the inter-project cumulative assessment does not reflect the full range of relevant developments within Braintree District or neighbouring authorities.</p>	Under Discussion
3.10.4	Assessment methodology	<p>The methodology for assessing Cumulative Effects was agreed through the <b>6.19 Scoping Report [APP-288] to [APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>Following additional review, BDC has concerns with the methodology and conclusions of both intra-project and inter-project assessments, including:</p> <ul style="list-style-type: none"> <li>limited consideration of combined landscape, visual, noise and recreational effects along the 180 km route;</li> </ul>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<ul style="list-style-type: none"> <li>potentially significant cumulative LVIA effects that are understated or screened out;</li> <li>insufficient assessment of cumulative effects arising from Limits of Deviation;</li> <li>very limited consideration of cumulative PRoW, traffic and amenity impacts; and</li> <li>a narrow interpretation of “worst-case” cumulative scenarios.</li> </ul> <p>BDC maintains that additional cumulative schemes must be incorporated and that further assessment is required before any conclusions can be agreed. Accordingly, the cumulative effects section remains under discussion.</p>	
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.6 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . The key parameters and assumptions presented are considered appropriate.	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	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 the environmental topic chapters ( <b>Chapters 6 – 16</b> of the <b>ES</b> ). The baseline conditions and receptors presented are considered appropriate.	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<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>ES</b> ). Embedded mitigation measures, designed as an inherent part of the Project are set out in the environmental topic chapters of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion
3.10.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters ( <b>Chapters 6 – 16</b> of the <b>ES</b> ). Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters of the ES and set out in the <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.	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.4 and 17.5 of <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.	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
<b>EIA – Assessment Conclusions</b>				
3.10.10	Construction effects	<p>The assessment of effects during construction is presented in Section 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> <p>An inter-project cumulative effects assessment has been undertaken for the Project and is presented in <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b> which includes disturbance to residents and demands on labour force, landscape and visual effects, public health, pedestrians, cyclists and horse riders). Further detail of each development noted by Braintree is provided in the bullet points that follow:</p> <ul style="list-style-type: none"> <li>• Bramford to Twinstead is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b></li> <li>• The Pelham to Rayleigh 400 kV development is not considered in the cumulative assessment as it comprises re-furbishment works (i.e. replacement of existing components) undertaken by permitted development, would involve minimal construction works</li> <li>• Rivenhall Incinerator is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b></li> <li>• The draft allocation for 5,000 new homes to the north of Kelvedon – This has not been</li> </ul>	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>considered as a decision to promote to site by Braintree Council was made in September 2025 – post submission of the DCO application. The Project used a cut-off date of 1 April 2025 to confirm the long list of developments considered within the cumulative assessment. However, since the 1 April the Applicant has been undertaking a monthly review of planning registers to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the ES then these would be published into the Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate)</p> <ul style="list-style-type: none"> <li>• The approved solar farm at Land East of Littlebury Coggeshall Road Feering is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b></li> <li>• A proposed up-to 600 dwelling parker land development at Land South West of Coggeshall Road Kelvedon is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b></li> <li>• There are multiple applications at Bradwell Quarry. Two of which are currently live. 24/00390/ECC is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b> and</li> </ul>		

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>ESS/28/25/BTE would be considered as per the draft allocation for 5,00 new homes as above</p> <ul style="list-style-type: none"> <li>An approved solar development at Land West of Park Road Rivenhall, Cressing Farm equestrian facilities, and the recently consented solar farm at Land South West of Cressing Temple Witham Road Cressing is considered within <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b>.</li> </ul> <p>An intra-project cumulative effects assessment has been undertaken for the Project and is also presented in <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b>.</p>		
3.10.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 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>	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.10.12	Outline CoCP	<p>The Outline CoCP 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>Meeting held on 9<sup>th</sup> October to agree on the structure for the Outline CoCP. A further meeting was held on 29<sup>th</sup> January 2025 to address comments from stakeholders.</p>	See responses to “data sources” and “assessment methodology” above. This remains under discussion.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.		

Other matters as required

### 3.13 Development Consent Order

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

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.1	DCO Requirements – Management plans	The <b>7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016]</b> and the <b>7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]</b> are provided as appendices of the <b>7.2 Outline Code of Construction Practice [REP3-025]</b> . The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These	BDC acknowledges that key environmental control measures are contained within the Outline Code of Construction Practice (CoCP) and its appendices. However, the Council remains concerned that the absence of a standalone Construction Environmental Management Plan (CEMP) risks gaps in environmental control, particularly in relation to cross-cutting environmental management, liaison procedures, materials and waste, and noise and vibration controls. BDC therefore seeks clarity on how the full scope ordinarily covered by a CEMP is secured through the suite of submitted documents, and	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		documents are controlled by Requirement 4 in Schedule 3 to the <b>3.1 Draft DCO [REP3-004]</b> .	reserves the right to provide further comment following review of these documents collectively and through the Local Impact Report. This matter remains under discussion.	
3.11.2	DCO Requirements – Construction hours	<p>The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The proposed core working hours allow for efficient delivery while maintaining safeguards to manage noise and other impacts.</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.</p> <p>The assessment presented in <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> is based on a set of parameters that include the core working hours for the construction phase of the Project.</p>	<p>BDC objects to the construction hours proposed in Requirement 7 of the draft DCO. The Council considers the proposed hours, including working on Saturday afternoon, Sundays and Public Holidays, plus start-up and close-down activities up to one hour either side of the core working hours, to be excessive and to provide insufficient respite for Noise Sensitive Receptors (NSRs).</p> <p>BDC's Relevant Representation highlights that extended hours risk significant noise impacts and may understate the significance of effect at NSRs. The Council therefore seeks amendments to Requirement 7 to:</p> <ul style="list-style-type: none"> <li>• reduce weekend and public holiday working;</li> <li>• limit start-up/close-down activities;</li> <li>• require approval from the relevant planning authority for any working outside of the agreed core hours;</li> <li>• more closely align the drafting with the more restrictive and recently examined Bramford–Twinstead Order.</li> </ul> <p>The Council maintains that, without these changes, the environmental and amenity effects arising from construction noise cannot be</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>It assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start up and close down activities taking place up to one hour either side of the core hours, and activities which can take place outside of the core working hours. The assessment concluded that with the embedded mitigation and controls set out in the <b>7.2 Outline Code of Construction Practice [REP3-025]</b>, significant effects during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of the <b>3.1 Draft Development Consent Order [REP3-004]</b> within the final Code of Construction Practice.</p> <p>The Applicant does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours.</p>	effectively controlled. The working hours proposed by the Applicant are not agreed.	
3.11.3	DCO Requirements – Construction management plans	<p>The <b>7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]</b> is controlled by Requirement 4 of Schedule 3 to the <b>3.1 Draft Development Consent Order [REP3-004]</b>. The definition of Code of Construction Practice in Article 2 includes its appendices.</p>	BDC remains concerned that the draft DCO does not include a dedicated Soil Management Plan Requirement. Soil handling, protection and reinstatement are critical to preventing long-term loss of soil quality and agricultural productivity, particularly given the scale of works and the extensive areas of Best and Most Versatile (BMV) land within the district.	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.4	DCO Requirements – Applications made under requirements	<p>The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of</p>	<p>While an Outline Soil Resource Plan (SRP) is appended to the Outline CoCP, the Council is not yet satisfied that the SRP provides the same level of clarity, enforceability and assurance as a standalone requirement.</p> <p>BDC therefore seeks the inclusion of a specific Requirement for a Soil Management Plan or alternatively clear evidence that the SRP fully secures all necessary protections, including topsoil/subsoil handling, storage, reinstatement, monitoring, and compliance reporting.</p> <p>Pending this clarification, the matter remains under discussion.</p> <p>BDC does not agree that a 28 day determination period is appropriate or realistic for discharging Requirements associated with a project of this scale.</p> <p>As set out in the Council's ExQ1 response (DCO 1.A2), a typical submission requires:</p> <ul style="list-style-type: none"> <li>• 1–3 working days for validation, logging and circulation internally;</li> <li>• 21 days for technical consultation with internal and external specialists;</li> <li>• additional time to resolve deficiencies in submitted material, request revisions, and re-consult where necessary; and</li> <li>• at least one week for internal reporting, checking and sign-off.</li> </ul> <p>The Council's experience on Bramford to Twinstead demonstrates that even a 35 day</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.5	DCO Requirements	<p>the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p> <p>Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the <b>3.1 Draft DCO [REP3-004]</b> to extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question.</p>	<p>period, supported by a Planning Performance Agreement, has proven highly challenging and has placed repeated pressure on both parties. Accordingly, BDC's position, as stated in its Local Impact Report and confirmed in its ExQ1 response, is that a minimum of 56 days is required for the lawful, robust and efficient discharge of Requirements. This period properly reflects the technical complexity, volume of information, and need for meaningful consultation.</p> <p>The Council therefore requests that Schedule 4 be amended to:</p> <ul style="list-style-type: none"> <li>• set a default determination period of 56 days;</li> <li>• include flexibility for extensions where necessitated by the complexity of submissions.</li> </ul> <p>Until these amendments are made, the matter remains Not Agreed.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
	– Further information	<p>authority to request additional information to be proportionate and appropriate.</p> <p>Paragraph 1(4) of Schedule 4 to <b>3.1 Draft DCO [REP3-004]</b> allows the relevant authority to seek the Applicant's consent to request further information after the five business day period if necessary.</p>	<p>In its ExQ1 response (DCO 1.A2), the Council explained that NSIP submissions frequently contain highly technical material requiring circulation to multiple internal and external specialists. Identifying where further information is needed cannot reliably be achieved within five days — particularly where:</p> <ul style="list-style-type: none"> <li>• the submission spans several environmental disciplines;</li> <li>• consultees need time to identify omissions or technical gaps;</li> <li>• preliminary review is delayed by officer workload, leave, or specialist availability; and</li> <li>• issues only become clear once consultees begin detailed assessment.</li> </ul> <p>BDC therefore requests that the period for seeking further information be increased to a minimum of seven business days, which is consistent with the Council's internal processes and reflects the complexity of typical Requirement submissions.</p> <p>The Council also requests that the Applicant serve all relevant Requirement documents on statutory consultees at the same time as the relevant planning authority to avoid unnecessary loss of time during validation and distribution.</p> <p>These changes are necessary to reduce the risk of deemed consent being triggered simply because the authority was not given adequate time to identify missing or inadequate information.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			Accordingly, this matter is Not Agreed pending amendment of the draft DCO to incorporate at least a seven-business-day period and simultaneous service of documents on all consultees.	
3.11.6	DCO Requirements – Fees	The Applicant has updated this figure in <b>3.1 Draft DCO [REP3-004]</b> . The Applicant proposes this matter is agreed.	BDC agrees that Schedule 4 must be updated to reflect the latest planning fee regulations. The Council's position is simply that the fee figure should be corrected in the next draft of the DCO in line with current guidance. Subject to this amendment being made, BDC is content with the drafting.	Under Discussion
3.11.7	DCO Requirements - Construction management plans)	<p><b>7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]</b> and <b>7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]</b> are provided as appendices of <b>7.2 Outline Code of Construction Practice [REP3-025]</b>.</p> <p><b>7.2 Outline Code of Construction Practice [REP3-025]</b> includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required.</p> <p>These documents are controlled by Requirement 4 in Schedule 3 to the <b>3.1 Draft DCO [REP3-004]</b>.</p>	<p>BDC does not agree that the current drafting appropriately secures the full range of construction-stage environmental controls. While the Outline Code of Construction Practice (OCoCP) contains important information, the Council remains concerned that relying on the OCoCP alone, without an expressly secured Construction Environmental Management Plan (CEMP) and standalone topic-specific management plans, risks gaps in control and ambiguity over how certain environmental protections will be delivered.</p> <p>As set out in the Local Impact Report and BDC's ExQ1 responses (including DCO 1.A2 and DCO 1.S5), Requirement submissions for NSIPs are complex, multi-disciplinary, and often interdependent. Clear, distinct and enforceable documents are essential to ensure that:</p>	Not Agreed.

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<ul style="list-style-type: none"> <li>• construction impacts are controlled in a transparent and coordinated way;</li> <li>• responsibilities for compliance and enforcement are unambiguous;</li> <li>• topic-specific mitigation measures (e.g. soil management, dust, noise, vibration, waste, pollution prevention) are properly defined and cannot be diluted; and</li> <li>• variations cannot be approved without appropriate environmental safeguards.</li> </ul> <p>The Council's experience with other DCOs demonstrates that insufficiently defined control documents can lead to significant practical difficulties at discharge stage, including uncertainty over scope, repeated clarification cycles, and risk of environmental impacts not being fully captured.</p> <p>For these reasons, BDC considers that the draft DCO should be amended so that:</p> <ul style="list-style-type: none"> <li>• a Construction Environmental Management Plan (CEMP) is explicitly required by a standalone Requirement;</li> </ul> <p>The DCO confirms how these documents interrelate with the OCoCP, ensuring full coverage of environmental impacts and avoiding gaps or overlap.</p> <p>BDC maintains that clear, separate and fully secured control documents are necessary to ensure the authorised development is constructed in a manner that reflects the environmental information assessed in the ES</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.8	DCO Requirements – Stages of the authorised development	<p>The Applicant has updated <b>3.1 Draft DCO [REP3-004]</b> the 28 day period to a 'business day' equivalent of 25 business days for consistency of terminology.</p> <p>The Applicant will consider the point raised on timescales and will provide an update at Deadline 4.</p>	<p>and the safeguards expected by the Examining Authority.</p> <p>On this basis, the Council does not agree the current drafting is adequate, and the matter remains Not Agreed.”</p> <p>BDC recognises, based on experience with the Bramford to Twinstead NSIP, that the written scheme of stages is subject to continual refinement as construction programming evolves. The Council therefore accepts that requiring the stages plan to be formally approved by the relevant planning authority may not be practical or proportionate.</p> <p>However, effective communication and coordination remain essential for managing the impacts of a project of this scale. BDC therefore reiterates its request (REP1-149, para. 16.2.52) that a minimum of 10 working days' notice be provided prior to the commencement of works under any stage. This is necessary to ensure that the Council is aware of upcoming activity, can manage statutory consultation where relevant, and can put in place the appropriate internal processes to support oversight and community liaison.</p> <p>Subject to the inclusion of a clear 10-working-day notice requirement, the Council is content that this matter can be resolved. Until that amendment is made, the position remains Under Discussion.</p>	Under Discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.11.9	DCO Requirements – Design and layout plans	<p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the <b>3.1 Draft DCO [REP3-004]</b>.</p> <p>As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of the draft DCO.</p>	<p>BDC does not agree that the current drafting of Requirement 6 provides sufficient control over the design and layout of the authorised development.</p> <p>The phrase ‘general accordance with’ affords the undertaker a high degree of flexibility and does not give the Council or affected communities confidence that amendments to works plans or design details will remain within the environmentally assessed parameters. For a scheme of this scale, BDC considers that the wording should be strengthened to require the authorised development to be carried out in substantial accordance with the relevant plans. In addition, the judgement as to whether any design changes would give rise to materially new or materially different environmental effects should not rest solely with the undertaker. Consistent with the approach advocated in the Council’s LIR and ExQ1 submissions, BDC considers that the relevant planning authority must be the decision-maker on whether any proposed variation remains within the assessed environmental envelope.</p> <p>Until Requirement 6 is amended to secure these safeguards, this matter remains Not Agreed.</p>	Under Discussion
3.11.10	DCO Requirements – Design of permanent buildings	<p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with</p>	<p>BDC does not agree that the current drafting provides sufficient control over the design of permanent buildings.</p> <p>The use of the term ‘general accordance with’ affords too much flexibility to the undertaker and</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>the relevant authority as prescribed in the <b>3.1 Draft DCO [REP3-004]</b>.</p> <p>As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of <b>3.1 Draft DCO [REP3-004]</b>.</p>	<p>creates a risk that buildings may diverge materially from the parameters assessed in the Environmental Statement. For a scheme of this scale, where the substations and associated structures have the potential for significant landscape, heritage and visual effects, stronger wording is required.</p> <p>BDC therefore requests that the drafting be amended so that the design of permanent buildings must be in substantial accordance with the relevant design and layout plans.</p> <p>Furthermore, the Council considers that the decision on whether any variation would give rise to materially new or materially different environmental effects should not rest solely with the undertaker. Consistent with the Council's LIR and ExQ1 submissions, this judgement should fall to the relevant planning authority, ensuring independent oversight and preventing unassessed changes from progressing.</p> <p>Until Requirement 12 is amended to secure these safeguards, the matter remains Not Agreed.</p>	
Other matters as required				

## Appendix A Draft DCO wording

Table A.1 Braintree District Council – Comments on the draft DCO

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
1.	DCO Wording – Notification Process	The Applicant agrees that it is important to agree the notification process and will engage with the Councils on this point post-consent.	Some of the commitments in the Outline CoCP (e.g. GH10) include notification of the Local Planning Authority “as appropriate” as part of unexpected contamination protocols and post-consent ground investigations. Clarification of how this notification will be secured through the DCO is required. The Council also requires details on how this notification procedure will operate in practice, and what post-consent documentation the Applicant will submit in compliance with the procedures outlined in the Outline CoCP. (Para. 11.6.2)	Under discussion
2.	DCO Wording – Geology and Hydrogeology	The Applicant notes the Council's position and considers that the controls proposed in the application documents will achieve this.	Subject to these matters being satisfactorily addressed and secured through robust and enforceable DCO Requirements, the Council considers that the geology and hydrogeology impacts of the proposed development are capable of being managed in accordance with national and local policy. (Para. 11.7.4)	Under discussion
3.	DCO Wording – Air Quality and Emissions	The Applicant notes the Council's position and considers that the controls proposed in the application documents will achieve this.	Subject to these matters being addressed and secured through clear and enforceable DCO Requirements, the Council considers that the air quality and emissions impacts of the proposed development are capable of being managed in accordance with national and local policy. (Para. 13.7.4)	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
4.	DCO Wording – Pre-commencement operations	<p>The Applicant has carefully considered the definition of 'pre-commencement operations' to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project and has provided justification for its inclusion as drafted in the 3.2 Explanatory Memorandum (Revision C). The additional items contained in the definition of 'pre-commencement operations' beyond those consented in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are:</p> <ul style="list-style-type: none"> <li>Listed building surveys – these have been included at the request of Essex County Council in paragraph 5.2.8 of its Local Impact Report [REP1-161];</li> <li>Protection works comprising utilities protection works or fencing and protection slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</li> <li>Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary</li> </ul>	<p>BDC does not agree that the current definition of 'pre-commencement operations' within the draft DCO provides sufficient clarity or environmental control.</p> <p>As set out in the Council's Local Impact Report and ExQ1 responses (including DCO 1.S5 and DCO 1.A2), a broad and unqualified definition risks allowing works to proceed before key environmental protections have been approved under Requirement 4. This is inconsistent with the scale and sensitivity of the NSIP, where early works may still have material environmental effects.</p> <p>BDC considers that the wording should be amended so that only genuinely low-impact, non-invasive activities may be undertaken prior to discharge of Requirements, and that any activities capable of causing environmental effects must not be included within 'pre-commencement operations'.</p> <p>In addition, the definition should incorporate a control mechanism to ensure the undertaker cannot self-certify whether a proposed pre-commencement activity does or does not give rise to materially new or different environmental effects. BDC therefore supports the addition of wording to the effect that pre-commencement operations must exclude any activity which, in the opinion of the relevant planning authority, could give rise to materially new or different environmental effects from those assessed in the ES.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>laydown areas in addition to construction compounds. National Grid does not consider its inclusion to be materially beyond the scope already set out.</p> <ul style="list-style-type: none"> <li>• Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put National Grid in a favourable position to deliver the Project by the target date.</li> </ul> <p>There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p> <p>Whilst noting the Planning Inspectorate's comments in Advice Note 15 regarding the use of the term "commence" within draft Orders, the ability to undertake these "pre-commencement operations" ahead of main construction is of great importance in the context of the anticipated construction programme for this Critical National Priority project which is geared towards achieving energisation by 2030 to facilitate the aims of Clean Power</p>	<p>This approach is consistent with the concerns raised in the LIR regarding early-stage works, the need for enforceable terminology, and the risk that uncontrolled pre-commencement activities could undermine environmental safeguards.</p> <p>Accordingly, BDC requests that Article 2 be amended to narrow and clarify the definition of 'pre-commencement operations' and to align it with the principle that no environmentally consequential works occur before Requirements are discharged.</p> <p>This matter remains Not Agreed until appropriate amendments are made.</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>2030. The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement.</p> <p>The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the Applicant considers that the exclusion of these works and operations from the definition is appropriate.</p> <p>The Applicant does not consider it necessary or appropriate to include the Council's proposed tailpiece, since any failure to comply with a term of the DCO by the Applicant would be an offence. Furthermore, recently made DCOs do not include such a tailpiece.</p>		
5.	DCO Wording – Certified documents	The definition of Environmental Statement in Article 2 of <b>3.1 Draft Development Consent Order [Revision C]</b> includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the Requirements. By virtue of	<p>BDC agrees that it is essential for all environmental information relevant to the authorised development to be clearly secured and readily identifiable within the certified documents.</p> <p>The Council's concern, as reflected in its Local Impact Report and ExQ1 submissions</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>this inclusion in the definition, and the inclusion of the Environmental Statement in Schedule 19 (certified documents), the Applicant's position remains that from a statutory drafting perspective, the proposed change is not necessary. The Applicant would note that the inclusion of a document in the list of certified documents does not give it any more weight than one that is not listed. The purpose of the list of certified documents is to record the correct version of the listed document at the time at which development consent is granted.</p> <p>The Applicant is unclear which list of certified documents the Council is seeking to be updated following the grant of development consent. It would be inappropriate and disproportionate to seek updates to Schedule 19 (certified documents) after the grant of development consent. The certified documents will be available on the Planning Inspectorate's website and, under Article 60(5) (certification of documents) the Applicant must make available in electronic form each of the plans or documents certified under that article. Each relevant authority would retain a record of any documents approved during the discharge of Requirements in the usual way.</p>	<p>(including DCO 1.S5 and DCO 1.A2), is that the current drafting does not expressly confirm that supplemental or additional environmental information submitted to discharge Requirements will become part of the certified suite. Without this certainty, there is a risk that key technical material used to approve construction-stage details may not be formally captured or may not be easily accessible to those responsible for compliance, monitoring, and enforcement.</p> <p>For a scheme of this scale and complexity, BDC considers that the certified documents list must operate as a complete and authoritative repository of environmental information relevant to the DCO. This ensures transparency, avoids ambiguity over which documents hold weight, and reflects the Council's practical experience that multiple submissions are typically made post-consent which materially inform design, construction methodology, or mitigation.</p> <p>To avoid inconsistency and ensure that the authorised development remains within the assessed environmental envelope, BDC requests that the draft DCO be amended so that:</p> <ul style="list-style-type: none"> <li>any supplemental or additional environmental information submitted for the purpose of complying with or discharging a Requirement is expressly incorporated into</li> </ul>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>the definition of 'Environmental Statement' for certification; and</p> <ul style="list-style-type: none"> <li>such documents are added to the certified documents schedule upon approval, ensuring clarity for regulators, contractors and the public.</li> </ul> <p>Subject to these clarifications being incorporated into the next draft of the DCO, BDC would be content. Until then, the matter remains Under Discussion.</p>	
6.	DCO Wording - Maintain	<p>It is not appropriate or necessary for the definition of "maintain" in the draft Development Consent Order to be amended as proposed. The question of whether works listed in that definition give rise to any materially new or materially different environmental effects to those identified in the environmental statement is, in the usual manner of development consent orders made to date, an objective test. Non-compliance with that objective test could be a breach of a term of the development consent order for the purposes of section 161 of the Planning Act 2008 enforceable in the usual manner.</p> <p>The inclusion of an obligation to maintain the Project is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe,</p>	<p>BDC does not agree that the current drafting of the maintenance provisions provides sufficient environmental control or clarity. The Council's position is that it must be clear who determines whether proposed maintenance works would give rise to any materially new or materially different environmental effects compared with those assessed in the Environmental Statement. As currently drafted, this judgement is left entirely to the undertaker, which does not provide an adequate safeguard and risks environmentally consequential works being treated as 'maintenance' without appropriate oversight. BDC considers that any maintenance activity with the potential to create materially new or different environmental effects should be subject to approval by the relevant planning authority, consistent with the wider approach to Requirements and with the expectations of a scheme of this scale.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		effective and efficient electricity transmission system	<p>In addition, the Council considers that the DCO should include a clear obligation on the undertaker to maintain the authorised development and to remove any equipment or works that become obsolete, to avoid unnecessary long-term landscape, heritage or amenity impacts.</p> <p>Until the maintenance provisions are amended to secure these safeguards, the matter remains Not Agreed.</p>	
7.	DCO Wording – Maintenance	<p>These proposed amendments are not appropriate or necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system.</p>	<p>Article 3, Development consent etc. granted by the Order is set out on page 10 of the N2T DCO.</p> <p>The Council considers that the undertaker should be under a mandatory obligation ('shall' instead of 'may') either to complete the authorised development in full or, where the scheme is not fully completed, to decommission works and remove any obsolete structures which are no longer required for the scheme.</p> <p>(Paras 16.2.10 – 16.2.11)</p>	Under discussion
8.	DCO Wording – Limits of deviation	<p>The vertical Limits of Deviation (LoD) would not exceed 6 m upwards to allow for variation in pylon positions whilst maintaining electrical clearance requirements. The 6 m vertical LoD allows for two standard pylon extensions to be added, which is not possible with a 4 m vertical LoD. This is due to lattice pylon extensions typically increasing by</p>	<p>Limits of Deviation (LoD)</p> <p>BDC does not agree that the limits of deviation (LoD) proposed in Article 5 of the draft DCO are justified or environmentally acceptable.</p> <p>As set out in the Council's Local Impact Report and detailed ExQ1 responses (including ALT 1.9), the Environmental Statement has not demonstrated that a true worst-case assessment has been undertaken for the full</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>increments of 3 m. A 6 m vertical LoD was sought and consented on the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicant's position is that the additional 2 m vertical LoD is proportionate to the scale of the Project and, therefore, the extent of any unknowns, the varying landforms and use across the circa 160 km overhead line route, and ongoing design coordination with a range of third-party developments that could lead to minor design changes at detailed design and construction stages. The limits of deviation have been assessed in the Environmental Statement submitted with the application for development consent.</p>	<p>extent of lateral, longitudinal and vertical movement permitted by the LoD. Many topic assessments, including landscape and visual, heritage, noise, and residential visual amenity, have been carried out using indicative or preferred pylon positions, rather than modelling the minimum receptor distances or maximum height changes permitted within the LoD envelope.</p> <p>For a scheme that introduces major and moderate–major residual effects in multiple sensitive locations, BDC considers that allowing potentially 50 metres of lateral movement and up to 6 metres of vertical deviation creates a material risk that the final constructed development could give rise to significantly greater adverse effects than those assessed in the ES. The Council has identified specific locations where even small positional changes could materially worsen impacts on:</p> <ul style="list-style-type: none"> <li>• sensitive landscape character areas;</li> <li>• listed buildings such as Cressing Temple Barns and Faulkbourne Hall;</li> <li>• residential receptors including those identified in the RVAA; and</li> <li>• noise-sensitive properties where construction activity could be brought materially closer than assessed.</li> </ul> <p>BDC therefore considers that the LoD must be reduced to reflect what has actually been assessed, unless and until the Applicant can</p>	


ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			<p>provide robust evidence that the maximum deviation has been fully tested for all relevant environmental topics. If flexibility is retained, a mechanism is required to ensure that any exercise of the LoD is subject to approval by the relevant planning authority, with clear demonstration that no materially new or materially different environmental effects would arise.</p> <p>The Council notes that a 4-metre vertical deviation was considered acceptable in the Bramford to Twinstead DCO and sees no justification for the greater degree of flexibility sought here.</p> <p>Until the deviation limits are reduced or appropriate safeguards introduced into the DCO, this matter remains Not Agreed.</p>	
9.	DCO Wording – Power to alter layout etc. of streets	<p>In relation to comments on Article 4 (Maintenance of authorised development) these proposed amendments are not appropriate or necessary. Notification of any works to alter the layout, etc. of streets would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project.</p>	<p>This provision [Article 14 (Power to alter layout etc of streets)] is set out on page 17 of the N2T DCO.</p> <p>The Council request notification as relevant planning authority in relation to such works. (Paras 16.2.19 – 16.2.20)</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
10.	DCO Wording – Access to works	<p>Notification of any works to accesses would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project.</p> <p>National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of</p>	<p>[Article 17 – Access to Works]</p> <p>BDC does not agree that the draft DCO provides adequate notification arrangements in relation to works affecting accesses.</p> <p>For effective oversight and to ensure that no unassessed or unintended environmental effects arise, the Council requires advance notice of any such works within its administrative area. A clear notification mechanism is also necessary to identify where further approvals may be required and to avoid conflicts with local highways, planning, or adjacent development schemes.</p> <p>The Council therefore requests that the DCO be amended to include a formal notice requirement to the relevant planning authority and an extension of the response period to 35 days, consistent with the approach taken in other DCOs and with the Council's established administrative processes.</p> <p>On this basis, the matter remains Not Agreed until a suitable notification mechanism and timescale are secured.</p>	Not Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p>		
11.	DCO Wording – Discharge of water	<p>National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that</p>	<p>[Article 20 – Discharge of Water]  BDC acknowledges that, to the extent this Requirement applies within its administrative area, the discharge of water provisions follow established DCO practice.  While the Council noted that a 35-day deemed consent period (as used in the Bramford to Twinstead DCO) would be preferable, BDC accepts that the detailed operation of these provisions is ultimately a matter for the Examining Authority's judgment.  On that basis, the Council does not pursue amendments to this Requirement further and</p>	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p>	<p>is content for the ExA to determine the appropriate approach.</p>	
12.	DCO Wording – Protective Works	<p>The 3.1 Draft Development Consent Order [Revision C], once granted, will provide the relevant planning consent for these protective works. The Applicant would notify owners and occupiers of the land prior to exercising certain rights under Article 21</p>	<p>[Article 21 – Protective Works] BDC considers that a formal notification mechanism is required where protective works outside the Order limits are proposed, so that the Council is aware of works within its administrative area that may give rise to environmental or planning implications.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>(Protective Provisions), except in the case of emergency.</p> <p>Article 61 (service of notices) of the 3.1 Draft Development Consent Order deals with the service of notices.</p>	<p>Such notification is necessary to ensure transparency, allow the authority to identify whether additional consents may be required, and to coordinate with other development or highway works.</p> <p>Until a suitable notification provision is included in the DCO, this matter remains Not Agreed</p>	
13.	DCO Wording – Felling and Lopping	<p>The proposed amendments (in relation to local authority notice and consent or amendments to the terms “overhanging” and “near”) to this standard form provision are not appropriate or necessary. Article 50 (Felling or lopping) within <b>3.1 Draft Development Consent Order [Revision C]</b>, together with <b>2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]</b>, set out controls on the Applicant’s powers to fell and lop trees.</p> <p>Whilst there is no definition of ‘near’ in the 3.1 Draft Development Consent Order (Revision C) (which is consistent with the model provisions on which this article is based) the power in Article 50 (1) is limited and the given circumstances will help to define its meaning. More specifically, the Applicant notes that the power at Article 50 (1) may only be exercised for the specific statutory purpose(s) set out, namely to prevent an obstruction or interference with the construction, maintenance or operation</p>	<p>[Article 50 – Felling and Lopping]</p> <p>BDC does not agree that the current drafting provides adequate control over tree works undertaken outside the Order limits. The term ‘near’ is vague and does not give sufficient certainty as to the extent of permissible works or the environmental implications.</p> <p>Experience from the Bramford to Twinstead DCO indicates that similar wording enabled more extensive lopping and removal than anticipated, with consequential landscape and amenity impacts. See BDC’s response to DCO 1.S11 for more information on examples.</p> <p>Given that once tree or hedgerow works occur the harm cannot be undone, BDC considers it essential that a third-party control mechanism is incorporated.</p> <p>The Council therefore requests that the DCO be amended to:</p> <ul style="list-style-type: none"> <li>• replace the undefined term ‘near’ with a clear and measurable threshold; and</li> <li>• require advance notification to the relevant planning authority for any tree works</li> </ul>	Not agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>of the 'authorised development' (as defined) or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same. Therefore, as the distance from the Order limits increases, the more unlikely it will be for these statutory tests to be met.</p> <p>Article 50(2) of <b>3.1 Draft Development Consent Order [Revision C]</b> places a statutory duty on the Applicant not to cause any unnecessary damage to any tree, shrub, shrubbery or hedgerow, or important hedgerow, when exercising its powers under this article.</p> <p>Other recent development consent orders have made similar provision. See, for example, Article 48 (1) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024, Article 81 (1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 32 (1) of the Cleve Hill Solar Park Order 2022 and Article 35 (1) of the Norfolk Boreas Offshore Wind Farm Order 2021. None of the Orders referred to included a definition of 'near'.</p> <p>The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within <b>3.1 Draft Development Consent Order [Revision C]</b> and to ensure that the delivery of the Project, which is of critical</p>	<p>outside the Order limits, ensuring such works are strictly limited to what is reasonably required and that unassessed environmental harm is avoided.</p> <p>Until these safeguards are secured, this matter remains Not Agreed</p>	

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
14.	DCO Wording – Trees subject to Tree Preservation Orders	<p>The proposed amendments (in relation to local authority notice and application of conditions or amendments to the term “near”) to this standard form provision are not appropriate or necessary. Article 51 (Trees subject to Tree Preservation Orders) within <b>3.1 Draft Development Consent Order [Revision C]</b>, together with <b>2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]</b>, set out controls on the Applicant’s powers to fell and lop trees protected by TPOs, both within and outside the Order limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024.</p> <p>The use of ‘near’ is to mirror the wording used in Article 50 (Felling and lopping of trees, etc). A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of</p>	<p>[Article 51 Trees subject to Tree Preservation Orders (TPO)]</p> <p>BDC does not agree that the current drafting provides sufficient clarity or control over works to trees subject to Tree Preservation Orders (TPOs), particularly where such works occur outside the Order limits.</p> <p>The term ‘near’ in the provision is vague and risks enabling extensive works without clear limits or oversight. Given the sensitivity of TPO trees and the potential for landscape, heritage and amenity harm, the Council requires a defined threshold and a formal mechanism for advance notification and approval.</p> <p>See response to Art 50 above.</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development.</p> <p>Additionally, Article 51(3) of <b>3.1 Draft Development Consent Order [Revision C]</b> places a statutory duty on the Applicant not to cause any unnecessary damage to any tree when exercising its powers under this article, a breach of which would be an offence.</p> <p>The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within <b>3.1 Draft Development Consent Order [Revision C]</b> and to ensure that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.</p> <p>Please see comments on Article 50 above.</p>		
15.	DCO Wording – Definitions and terminology	<p>The Applicant has considered the point and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has amended the drafting in <b>3.1 Draft Development Consent Order [Revision C]</b> submitted at</p>	<p>BDC does not agree that the current use of 'days' within the draft DCO is appropriate.</p> <p>For a project of this scale, precision and consistency in time-based drafting are essential. The use of calendar days introduces ambiguity around weekends, bank holidays and periods when officers, statutory consultees or technical specialists may not be</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>Deadline 3 to refer to business days rather than days.</p>	<p>available, which in turn increases the risk of procedural error or unintended deemed consent outcomes.</p> <p>The Council's ExQ1 submissions explain that discharging Requirements involves multiple internal and external consultees and structured processes which rely on administratively workable periods. Expressing all timescales in 'business days' provides the clarity needed for effective regulatory oversight and ensures that each period reflects actual working days available for assessment, consultation and decision-making.</p> <p>BDC therefore requests that all references to 'days' in the draft DCO be amended to 'business days' to ensure consistency across Requirements, notices and procedural provisions, and to avoid uncertainty over the operation of statutory and administrative timelines.</p> <p>Subject to this amendment being made, the matter would be capable of agreement. It therefore remains Under Discussion</p>	
16.	DCO Wording – Service of Notices	<p>This article replicates the wording of article 45 of the National Grid (Hinkley Point C Connection Project) Order 2016 and article 57 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. The Applicant notes that the Council is not seeking to alter this standard form procedural wording but wishes to agree within its context how</p>	<p>[Article 61 – Service of Notices]</p> <p>The Council requests that an agreed protocol between Council and undertaker is established from the outset in order to secure efficient and direct communication between parties. (Paras 16.2.37 – 16.2.38)</p>	Under discussion

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>notices are to be given day to day. This is noted and would be a matter for discussion between the Applicant and the Council following the making of the Development Consent Order.</p>		
17.	<p>DCO Wording – Associated Development</p>	<p>These proposed amendments are not appropriate or necessary.</p> <p>The Applicant does not agree that the words 'in the opinion of the relevant planning authority' should be added to paragraph (u) of the Associated Development section of Schedule 1 of 3.1 Draft Development Consent Order [APP-056].</p> <p>Producing reports for consideration by the relevant authority in each instance any works fall within the final paragraph of 'associated development' and seeking the relevant planning authority's opinion on whether an element of associated development may result in a materially new or materially different environmental effect would be a disproportionate administrative and financial burden on both the Applicant and the relevant authority and could frustrate the delivery of this Project of critical national priority. In turn, this could contribute to the accumulation of additional constraints costs that would ultimately fall to the consumer.</p> <p>The Applicant's position is that the assessment as to whether an element of</p>	<p>BDC does not agree that the current drafting provides sufficient control over works undertaken under the umbrella of 'associated development'.</p> <p>As drafted, the undertaker alone determines whether such works would give rise to materially new or materially different environmental effects. For a project of this scale, this approach does not offer an adequate safeguard; there is no independent check or incentive for the undertaker to identify when additional assessment or consent may be required.</p> <p>To ensure proper oversight, BDC requests that the provision be amended so that any judgement on environmental effects arising from associated development is made in the opinion of the relevant planning authority.</p> <p>In addition, because the category of associated development is currently broad and unspecified, the Council requires advance notification of any such works. This is essential to maintain a full understanding of the project as built, to identify any interactions with other regulatory processes, and to ensure that unassessed or avoidable impacts do not arise.</p>	Not agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		<p>currently unspecified associated development (some of which may be very inconsequential in nature) results in a new or materially different environmental effect should remain with the Applicant, noting that a failure of the Applicant to comply with a term of the DCO would be an offence.</p> <p>Equally, the Applicant is conscious of the potential for significant additional administrative burden, both on the Applicant and the relevant authority, should notification be required for any works that fall within the remit of associated development.</p>	<p>Until these safeguards are incorporated into the draft DCO, this matter remains Not Agreed.</p>	

## 4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of Braintree District Council:

.....

Date:

.....

# Abbreviations

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

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

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)