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Norwich to Tilbury

Volume 5: Reports and Statements

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Borough Council - Tracked Changes Version

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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 'The Applicant' 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 Brentwood Borough Council (BBC). Brentwood Borough Council 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 [45](#). It is intended to be a live and working document which will be updated as the Project progresses and shared with Brentwood Borough Council 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 BBC. The applicable matters considered within this SoCG apply to BBC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):
- Project development, description and design
 - Ecology and Biodiversity

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

Brentwood Borough Council will have regard to any points raised by statutory bodies and other relevant Interested Parties in respect of the matters covered in the SoCG. Therefore, this version reflects the current position of Brentwood Borough Council but may be subject to change during the examination. A final position will be recorded in the final SoCG to be submitted close to the examination.

1.2 Summary of Matters Under Discussion

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

SoCG ID	Summary of matter under discussion	Deadline for resolution
Project development, description and design		
3.2.5 – Haverings Grove	BCC reiterates its request for consideration of alternative solutions, including re-routing or undergrounding. The Applicant has taken account of the potential effect of the proposals and considered several alternatives in the area.	Matter unlikely to be agreed.
3.2.6 – Dunton Hills Garden Village (DHGV)	BBC considers that the Applicant has not adequately assessed the impact of the alignment on the deliverability and viability of DHGV and that the proposals undermine Garden Community Principles. The Applicant’s position is that deliverability of DHGV is not prejudiced by the Project. Further detail on this position is provided in Section 3.8 of Applicant’s Comments on Local Impact Reports [REP2-030]	Matter unlikely to be agreed.
3.2.7 – Ingatestone	BBC remains concerned that despite the change in route alignment east of Ingatestone, there is a continued risk of significant adverse effects, and consideration of re-routing or	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.2.8 – 3.2.11 - Consultation	<p>undergrounding is required.</p> <p>The Applicant has taken into account the potential effect of its proposals when developing the alignment and provides a more detailed responses in Applicant's response to this matter in Table 4.16 ID 6.4.9-50 and Table 4.20 ID 6.59 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>BBC acknowledges that the 2022, 2023 and 2024 consultations were undertaken in accordance with the Consultation Strategy and Statement of Community Consultation (SoCC), though query the targeted consultation process completed in 2025.</p> <p>The Applicant undertook consultations in accordance with the respective consultation strategies and SoCC, and responses to feedback are contained within the 5.1 Consultation Feedback Report [APP-066].</p>	Matter unlikely to be agreed.
Ecology and Biodiversity		
3.3.6 – Key parameters and assumptions	<p>BBC defer to Essex CCCounty Council (ECC) in that ECC recommends replacement planting failure percentage should be factored into the compensation requirement. The Applicant confirms a commitment to a 5-year aftercare period for all replacement tree and hedgerow planting and a 30-year aftercare period at Environmental Areas.</p>	Resolution likely by Deadline 7.
<u>3.3.11 – Construction Effects</u>	<p><u>BBC noted that this matter is still under discussion in line with the Essex County Council Statement of Common Ground. The Applicant has provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and at Deadline 2 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-032].</u></p>	<u>Resolution likely by Deadline 7</u>
3.3.14 – Outline LEMP	<p>BBC requests further clarification around bat hibernation.</p> <p>The Applicant has provided further clarification regarding the criteria used for defining a tree's bat hibernation potential and notes that all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.3.15 – Biodiversity Net Gain (BNG) – Onsite and Assessment 3.3.16 – BNG Offsite	<p>BBC requests assurance that BNG initiatives will be relevant to the affected areas of the authority and co-developed with the relevant stakeholders. The Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. As noted in, 7.1 Biodiversity Net Gain Report [APP-299], while every effort has been made to deliver the required biodiversity units onsite, this 10% net gain is not fully achievable onsite. Off-site biodiversity units are therefore proposed to make up this deficit. Further details on the long-term monitoring and management of BNG is provided in response to BIO 1.45 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074]. In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030].</p>	Resolution likely by Deadline 7.
3.3.17 – Arboriculture Impact Assessment (AIA)	<p>BBC objects to the removal of veteran trees and any direct or indirect impact on ancient woodland. BBC considers that the proposed mitigation is inadequate.</p> <p>The Applicant maintains that 6.13 ES Appendix Arboricultural Impact Assessment [REP1-065] was prepared in accordance with Appendix J of 6.19 Scoping Report - including appendices B to K [APP-296] and is considered appropriate for this stage of the project.</p> <p>The Applicant reiterates that commitments through the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] and 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] seek to retain trees wherever possible and set out mitigation and compensation measures for veteran trees and ancient woodlands.</p>	Matter unlikely to be agreed.
3.3.20 – Baseline conditions and receptors (bats) 3.3.21 – Standard mitigation (bats)	<p>BBC state further survey effort is feasible and would support a better estimation of impact and therefore more proportionate mitigation/compensation.</p> <p>The Applicant confirms that the methodology for surveying bat roosts has taken a pragmatic approach given the scale of the Project and has been agreed with Natural England. Full aerial/emergence bat surveys will be undertaken</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>on trees due to be lost during the detailed design phase of the Project.</p> <p>The Applicant maintains that baseline conditions and receptors presented are considered appropriate.</p>	
Noise and Vibration		
3.5.7 – Embedded mitigation	BBC considers the Noise and Vibration embedded mitigation measures insufficient given	Resolution likely by Deadline 7.
3.5.8 – Standard mitigation	the proximity of works to residential areas and recreational spaces and is concerned about monitoring and response protocols proposed.	
3.5.9 – Additional mitigation	The Applicant maintains that the proposed mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. 7.2 Outline Code of Construction Practice [REP3-025REP4-164]	
3.5.10 – Construction effects	and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306REP4-170] include protocols for vibration monitoring in situations where there is potential for damage to buildings or structures, as well as the commitment for pre- and post-condition surveys.	
3.5.12 – Outline CoCP		
Health and Wellbeing		
3.6.6 – Baseline conditions, receptors and mitigation	BBC is concerned that the working hours will cause unacceptable disturbance and harm to public amenity. The Applicant maintains that the baseline conditions and receptors are considered appropriate. The Applicant states that the proposed construction working hours have been assessed through the ES with the noise and vibration, and traffic and transport assessments concluded no significant effects during construction when the proposed mitigation measures set out in 7.2 Outline Code of Construction Practice, [REP3-025REP4-164] are implemented. a more detailed response in presented in Table 4.14 ID 6.45, 6.46 of 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030] .	Matter unlikely to be agreed.
3.6.7 –Construction effects		
3.6.9 – Outline CoCP		
Historic Environment		
3.7.6 – Data sources (Archaeology) – survey data	BBC notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. ECC maintain they are unable to agree key parameters and assumptions until	Matter unlikely to be agreed.
3.7.10 – Key		

SoCG ID	Summary of matter under discussion	Deadline for resolution
parameters and assumptions	<p>field work has been completed.</p> <p>The Applicant maintains that sufficient data has been collected to inform assessment, but notes that survey work is ongoing with results likely in August 2026.</p>	
3.7.13 – Embedded mitigation	<p>BBC has concerns that the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation.</p> <p>The Applicant maintains that the embedded mitigation is considered appropriate and adequate.</p>	Matter unlikely to be agreed.
3.7.14b – Standard mitigation (Built heritage)	<p>BBC maintains that H07 should be expanded to have a method of contact during construction.</p> <p>The Applicant states that the current approach is considered appropriate and further details regarding construction vibration effects on listed buildings have been provided in response to ExQ1 HE 1.11.</p>	Matter unlikely to be agreed.
3.7.16 – Additional mitigation	<p>BBC’s position is that agreement on this matter will depend on the methodologies proposed in the Outline AMS-WSI.</p>	Resolution likely by Deadline 7.
3.7.24 – Outline Archaeological Mitigation Strategy and Outline WSI	<p>The Applicant is currently preparing an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] scheduled for submission at Deadline 5.</p>	
Landscape and visual		
3.8.1 – Policy and legislation	<p>BBC has concerns that the some of the evaluation of valued landscapes is flawed, and the judgement on significance.</p> <p>The Applicant maintains that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	Matter unlikely to be agreed.
3.8.3 – Data sources	<p>BBC has concerns regarding gaps in viewpoint distribution and with the approach to landscape value and value of the view. ECC also requests improvements to presentation to improve access and interpretation.</p> <p>The Applicant states that sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and</p>	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>Visual. The Applicant states that the request for 1:10,000 scale mapping for 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243] was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure.</p>	
3.8.4 – Assessment methodology (including LVIA methodology)	<p>BBC confirmed viewpoint methodology is still under discussion.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as ‘not agreed.’</p>	Matter unlikely to be agreed.
3.8.5 – Key parameters and assumptions 3.8.6 – Baseline conditions and receptors	<p>BBC has concerns about unacceptable landscape and visual harm and seeks undergrounding to be considered in sensitive areas.</p> <p>The Applicant maintains that the key parameters and assumptions presented are considered appropriate. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as ‘not agreed.’</p>	Matter unlikely to be agreed.
3.8.7 – Embedded mitigation	<p>BBC has concerns on landscape and visual effects around Haverings Grove and requests for undergrounding to be considered, and the removal of 132kV in the area to reduce cumulative effects.</p> <p>The Applicant maintains that the embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and sets out the options considered in this area as presented in the Design Development Report. A more detailed response on the Applicant’s position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030].</p>	Matter unlikely to be agreed.
3.8.8 – Standard mitigation 3.8.9 – Additional mitigation	<p>BBC is concerned that mitigation measures proposed does not address residual landscape effects or compensation.</p> <p>The Applicant maintains that the proposed mitigation is considered appropriate and</p>	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	adequate, in terms of its nature and scale, to address potential effects.	
3.8.10 – Construction effects	<p>BBC is concerned that the potential tree and hedgerow loss has not been meaningfully quantified in relation to landscape and visual.</p> <p>The Applicant maintains that the assessment of effects during construction presented is considered appropriate and refers to the vegetation loss assessment is set out in 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section a [APP-048].</p>	Resolution likely by Deadline 7.
3.8.11 – Operational (and maintenance) effects	<p>BBC request the consideration of further re-routing and undergrounding to reduce significant landscape and visual effects.</p> <p>The Applicant confirms that the approach to the LVIA follows professional guidance and was discussed with stakeholders. The Applicant considers that the judgements made as part of the assessments remain fair and reasonable.</p>	Matter unlikely to be agreed.
3.8.12 – Outline CoCP	<p>ECC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete. BCC supports ECC position.</p>	Resolution likely by Deadline 7.
3.8.13 – Outline LEMP	<p>BBC request clarity on the different types of mitigation, timescales for planting care and request an ongoing role/consultation to ensure long term planting success.</p> <p>The Applicant notes that 7.4 Outline Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>The Applicant has also provided responses to concerns raised related to aftercare of replacement planting and mitigation within Environmental Areas in Table 4.20 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	Resolution likely by Deadline 7.
Socio-economics, Recreation and Tourism		
3.9.1 – Policy and legislation	BBC recommends to prepare an Employment and Skills Strategy and requests detailed labour-	Resolution likely by Deadline 7.
3.9.3 – Data sources	<p>market demand data and targeted upskilling-</p> <p>The Applicant proposes to prepare and submit an Employment and Skills Plan into-</p>	

SoCG ID	Summary of matter under discussion	Deadline for resolution
	the Examination at Deadline 5. The Applicant also confirms continued engagement to deliver long-lasting community benefits.	
3.9.4— Assessment methodology	BBC have made no comments on the Assessment Methodology. The Applicant anticipates this matter can move to Agreed.	Resolution likely by Deadline 7.
3.9.5— Key parameters and assumptions	BBC is concerned about regional employment opportunities, the proposed electricity bill discount scheme and wider community benefit funds. BBC are also concerned about the potential negative impact on the visitor economy and requests the Applicant prepare a Local Economic and Skills Plan. The Applicant maintains that the key parameters and assumptions presented are considered appropriate. The Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5.	Resolution likely by Deadline 7.
3.9.6— Baseline conditions and receptors	BBC to review the section on baseline conditions and receptors and provide the Applicant with an update once complete.	Resolution likely by Deadline 7.
3.9.7— Embedded mitigation	BBC requests that skills and community benefits should be considered separately.	Resolution likely by Deadline 7.
3.9.8— Standard mitigation	The Applicant maintains that the proposed mitigation is considered appropriate and	
3.9.9— Additional mitigation	adequate, in terms of its nature and scale, to address potential effects. The Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5.	
3.9.10— Construction effects	BBC is reviewing these sections and will provide the Applicant with an update once complete.	Resolution likely by Deadline 7.
3.9.11— Operational (and maintenance) effects	The Applicant will liaise with BBC once feedback is received.	
3.9.12— Outline CoCP		
Cumulative Effects		
3.10.10 – Construction effects	BBC considers that the cumulative impacts of Dunton Hills Garden Village and Lower Thames Crossing have not been adequately assessed in accordance with NPS EN-1 and EN-5.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>The Applicant reiterates that the assessment was undertaken in accordance with the 6.19 Scoping Report [APP-288 -to APP-296] and 6.20 Scoping Opinion [APP-297] which includes these two projects.</p> <p>BBC request evidence of engagement with National Highways to address cumulative effects. The Applicant refers to the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for cumulative assessment of proposed developments and Primary Access Routes.</p> <p>BBC also raises concerns of the wider Brentwood Southern Growth Corridor, requesting the consideration of alternative access options.</p> <p>The Applicant confirms that flows from the Brentwood Enterprise Park are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within the transport assessments.</p>	
<p>3.10.7— Embedded mitigation</p> <p>3.10.8—Standard mitigation</p> <p>3.10.9— Additional mitigation</p>	<p>BBC requests further discussions to ensure mitigation is agreed and secured appropriately.</p> <p>The Applicant maintains that all proposed mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects, and will be secured through the DCO.</p>	<p>Resolution likely by Deadline 7.</p>
<p>3.10.12 – Outline CoCP</p>	<p>BBC is reviewing the updated 7.2 Outline Code of Construction Practice [REP3-025REP4-164] and will provide the Applicant with an update once complete.</p>	<p>Resolution likely by Deadline 7.</p>
Development Consent Order		
<p>3.11.1</p>	<p>BBC considers the proposed notice period for pre-commencement operations and wider timescales for discharge of Requirements to too short to enable proper review, consultation, and decision-making.</p> <p>The Applicant considers the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate given no action is required by the authority, but has amended</p>	<p>Resolution likely by Deadline 7 <u>Matter unlikely to be agreed.</u></p>

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.11.2	<p>the Draft DCO to refer to “five business days” for consistency of terminology.</p> <p>BBC considers the proposed determination period for discharge of Requirements insufficient to enable proper assessment, consultation, and decision-making, and raises concerns about the risks associated with deemed consent provisions.</p> <p>The Applicant has revised the proposed period to 25 business days (equivalent to 35 days) and considers this proportionate and necessary to avoid project delays. The Applicant notes that this period can be extended by agreement in writing where required. The Applicant considers deemed discharge provisions to be appropriate and precedented, and necessary to avoid delays to a project of critical national importance.</p>	<p>Resolution likely by Deadline 7 <u>Matter unlikely to be agreed.</u></p>
3.11.3	<p>BBC requests that a register of requirements should be included for transparency and accountability.</p> <p>The Applicant considers this unnecessary and disproportionate and notes that each authority can maintain its own register. <u>The Applicant will continue to liaise with BBC on this matter in light of the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements.</u></p>	<p><u>Resolution likely by Deadline 7.</u></p>
3.11.4	<p>BBC considers that a post-consent ecological mitigation programme and BNG delivery plan should be secured through a DCO Requirement.</p> <p>The Applicant proposes to secure at least 10% BNG through a unilateral undertaking and does not consider additional Requirements necessary. The Applicant will continue to liaise with ECG on this matter.</p>	<p><u>Matter unlikely to be agreed.</u></p>
3.11.5 Appendix A	<p>Discussions are ongoing in relation to detailed drafting points on:</p> <ul style="list-style-type: none"> Decision-making and approval timescales; Scope of authorised development; Limits of deviation; Disapplication of Hedgerows Regulations Pre-commencement operations; Draft protective provisions; and Inclusion of as register of requirements. 	<p>Resolution likely by Deadline 7.</p>

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 (AONB1))
 - 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 BBC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

2. Record of Key Engagement

2.1 Introduction

2.1.1 The Applicant has engaged with BBC on the Project throughout the pre-application process. This has included:

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

2.1.2 Further details on the Applicant's engagement with stakeholders are provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between the Applicant and BBC.

2.2.2 It is agreed that the below is an accurate record of the key meetings and consultation undertaken between the Applicant and Brentwood Borough Council in relation to the issues addressed in this SoCG.

Table 2.1 Summary of Key Engagement between National Grid and Brentwood Borough Council

Date	Format	Topic/Description
General		
August 2022	Meeting	Informal project catch-up and consultation feedback with BBC.
September 2022	Meeting	All host authority workshop.
October 2022	Meeting	Informal project catch up with BBC
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.

Date	Format	Topic/Description
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
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	The Applicant issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	The ApplicantGrid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	The Applicant issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on draft versions of the Outline Landscape and Ecological Management Plan (Outline LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and

Date	Format	Topic/Description
		design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	The Applicant issued the 2 nd iteration draft versions of the Outline CoCP and Outline LEMP to all host authorities for comment.
January 2025	Meeting	The Applicant held a meeting to discuss comments from stakeholders on the 2 nd 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	The Applicant issued an updated iteration of the draft Outline Code of Construction Practice (oCoCP)
May 2025	Email correspondence	The Applicant issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email correspondence	The Applicant issued the Long List of Other Developments
June 2025	Email Correspondence	The Applicant issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	The Applicant issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission

Date	Format	Topic/Description
March 2026	Meeting	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
Ecology and Biodiversity		
July 2022	Email Correspondence	The Applicant 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 - the Applicant presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from BBC and other authorities.
September 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	The Applicant issued the Protected

Date	Format	Topic/Description
		Species Proposed Mitigation Measures to stakeholders including BBC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant shared the Biodiversity Net Gain Strategy.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the draft Biodiversity Net Gain Report.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on the second iteration of the Outline LEMP and CoCP.
January 2025	Email Correspondence	The Applicant shared second iteration of the Outline LEMP.
January 2025	Email Correspondence	The Applicant issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment.
January 2025	Email Correspondence	The Applicant issued the Biodiversity Net Gain Assessment Strategy.
March 2025	Email Correspondence	The Applicant issued the draft Arboriculture Impact Assessment (AIA).
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document.
May 2025	Email Correspondence	The Applicant issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP).
May 2025	Email Correspondence	The Applicant shared a new appendix to the Outline Landscape and Ecological Management Plan

Date	Format	Topic/Description
		(oLEMP) – Appendix D, Outline Landscape Proposals
May 2025	Meeting	The Applicant hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground with Essex Place Services.
May 2026	Meeting	Meeting to discuss draft bat licences with Essex Place Services.
Air Quality		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Air Quality assessment for review and comment.
Noise and Vibration		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Noise and Vibration section of the Environmental Statement.
Health and Wellbeing		
September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	The Applicant held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	The Applicant issued a refreshed Health and Wellbeing technical note on the proposed approach to

Date	Format	Topic/Description
		the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
Historic Environment		
July 2022	Email Correspondence	The Applicant issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	The Applicant presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and

Date	Format	Topic/Description
		additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	The Applicant shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	The Applicant shared Applicant shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
March 2024	Email Correspondence	Project response to Stakeholder feedback on Heritage Viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
February 2025	Meeting	Historic Environment Thematic Group Meeting to discuss the Historic Environment Viewpoints.
February 2025	Technical note	The Applicant shared the Draft Heritage Baseline Report with Annex C and D.
February 2025	Meeting	Thematic Group Meeting to discuss the Heritage Baseline report
March 2025	Email Correspondence	The Applicant issued updated the Historic Environment Viewpoints information to stakeholders including BBC.
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
May 2025	Meeting	Archaeology Working Group

Date	Format	Topic/Description
		Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	The Applicant share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting.
August 2025	Meeting	Archaeology Working Group Meeting.
September 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	Meeting	Archaeology Working Group Meeting.
December 2025	Meeting	Archaeology Working Group Meeting.
January 2026	Meeting	Archaeology Working Group Meeting.
February 2026	Meeting	Archaeology Working Group Meeting.
March 2026	Meeting	Archaeology Working Group Meeting.
<u>April 2026</u>	<u>Meeting</u>	<u>Archaeology Working Group Meeting.</u>
<u>May 2026</u>	<u>Meeting</u>	<u>Archaeology Working Group Meeting.</u>
<u>May 2026</u>	<u>Email</u>	<u>The Applicant shared the Outline AMS and OWSI for further comment.</u>
<u>May 2026</u>	<u>Email</u>	<u>The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.</u>
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural

Date	Format	Topic/Description
January 2023	Email Correspondence	Assessment Methodology for review. The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	The Applicant held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Essex. The Applicant sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
April 2023	Meeting	The Applicant held a meeting to discuss stakeholder’s feedback on EIA viewpoints previously shared.
May 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	The Applicant shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.

Date	Format	Topic/Description
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	The Applicant held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	The Applicant shared the shapefiles for the landscape viewpoints and order limits with BBC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape and Visual Thematic Group Meeting – LVIA Viewpoints within Essex South and Thurrock
October 2024	Meeting	The Applicant held a meeting to discuss on the draft versions of the Outline LEMP and Outline CoCP.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	The Applicant shared updated view point information data following from the landscape thematic workshops
November 2024	Meeting	Thematic group meeting to discuss

Date	Format	Topic/Description
		viewpoints and methodology.
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology.
March 2025	Email Correspondence	The Applicant issued the draft Arboricultural Impact Assessment: (AIA) .
May 2025	Email Correspondence	The Applicant 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.
March 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BBC's Local Impact Report.
May 2026	Meeting	Meeting with Essex Place Services representing Brentwood on the Statement of Common Ground.

Socio-economics, Recreation and Tourism

July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics,

Date	Format	Topic/Description
		Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including BBC.
June 2023	Technical Note	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	The Applicant shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	The Applicant held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to Brentwood Borough Council 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 BBC. 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	Brentwood Borough Council's Position	Status
Strategic options/needs case				
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. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p> <p>For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</p> <p>National Grid provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023REP1132].</p>	<p>BBC recognises the national importance of delivering grid reinforcement to support the transition to a low-carbon energy network. However, the Council objects to the Norwich to Tilbury proposals as currently submitted because they fail to demonstrate full consideration of credible alternatives and do not adequately address the significant environmental, social, and economic impacts on Brentwood's communities, landscape, heritage, and strategic growth areas.</p>	Not agreed
3.2.2	Project timing	<p>Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network –</p>	<p>BBC Response to Targeted Consultations (March 2025):</p> <p>BBC acknowledge that the grid capacity offered</p>	Not agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>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 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>National Grid provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023REP1-132].</p>	<p>by the Norwich to Tilbury project is needed by the timescales proposed, noting NESO's Clean Power Action Plan. However, BBC also supports the ECC position that the applicant must not restrict the justification on future network expansion solely based on the ESO contracted position, particularly when this limits the proper consideration of alternatives in accordance with good planning.</p>	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p>	<p>While BBC recognises the national need for grid reinforcement, it considers that the submission of this DCO (Development Consent Order) application is premature because credible alternatives have not been fully assessed. The Council objects to the application on this basis and urges the Applicant to undertake a comprehensive appraisal of options that could deliver the required capacity with significantly reduced environmental and community impacts. In particular, the Council seeks further investigation of a coordinated offshore solution and High Voltage Direct Current (HVDC) undergrounding, both of which were identified in</p>	Not agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore Alternatives' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</p>	<p>the ESO East Anglia Network Study as viable alternatives. Furthermore, in the NG Eastern Green Link 3 and 4 Strategic Options Report, it is suggested in paragraph 5.0.3 that capital costs for alternative solutions are similar. Therefore, these options should be evaluated transparently, with robust cost-benefit analysis and consideration of planning, environmental, and socio-economic implications before progressing with an overhead line solution. This is especially the case in the context of a national housing crisis and with BBC making strenuous efforts to deliver housing through its Local Plan to meet identified need, which is in no way aided by the OHL solution and the broader visual blighting of potential development land along the route within Brentwood and beyond.</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>The work undertaken shows that</p>	<p>While BBC recognises the national need for grid reinforcement, it considers that the submission of this DCO (Development Consent Order) application is premature because credible alternatives have not been fully assessed. The Council objects to the application on this basis and urges the Applicant to undertake a comprehensive appraisal of options that could deliver the required capacity with significantly reduced environmental and community impacts. In particular, the Council seeks further investigation of a coordinated offshore solution and High Voltage Direct Current (HVDC) undergrounding, both of which were identified in the ESO East Anglia Network Study as viable alternatives. Furthermore, in the NG Eastern</p>	Not agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>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 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>Green Link 3 and 4 Strategic Options Report, it is suggested in paragraph 5.0.3 that capital costs for alternative solutions are similar. Therefore, these options should be evaluated transparently, with robust cost-benefit analysis and consideration of planning, environmental, and socio-economic implications before progressing with an overhead line solution. This is especially the case in the context of a national housing crisis and with BBC making strenuous efforts to deliver housing through its Local Plan to meet identified need, which is in no way aided by the OHL solution and the broader visual blighting of potential development land along the route within Brentwood and beyond.</p>	
Project development process - Design				
3.2.5	Haverings Grove	<p>The Applicant has taken into account the potential effect of its proposals when developing the route alignment. We have considered several alternatives in this area to move the alignment further west from Haverings Grove. We are proposing to underground part of the 132 kV overhead line in this area which therefore facilitates the change to the alignment slightly further to the west. The residual effects in the area around Haverings Grove will be reported in the Environmental Statement supporting the DCO.</p> <p>Temporary disruption to agricultural operations during construction would be reduced through good practice, such as</p>	<p>BBC acknowledges and welcomes the changes to the proposals at Haverings Grove made during the ApplicantsNational Grid's Applicants targeted consultation, including the undergrounding of approximately 2km of the existing UKPN 132kV line, the repositioning of pylons TB209 to TB211, and the relocation of the temporary construction laydown area.</p> <p>However, despite these refinements, the Council maintains its objection to the proposed alignment in this locality. The routing of the 400kV overhead line along the northern, western, and southern boundaries of Haverings Grove creates a harmful severing effect, acting as an imposing physical barrier between the settlement and Hutton. The proximity of the transmission line to</p>	 <p>Under discussion</p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>maintaining/providing alternative access and water supplies, reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04 and AS05 within the 7.2 Outline Code of Construction Practice [REP3-025REP4-164]).</p> <p>These measures will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [REP3-004REP4-037] within the final Code of Construction Practice.</p> <p>All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project, as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138].</p>	<p>residential properties at this 'pinch point' exacerbates the adverse impact on local amenity and community cohesion.</p> <p>The Council reiterates its request for serious consideration of alternative solutions, including re-routing or undergrounding, to mitigate these impacts. In addition, concerns remain regarding the suitability of proposed access routes for construction compounds, which risk unacceptable disruption to local agricultural operations. BBC seeks reassurance that these access arrangements have been fully assessed and that appropriate mitigation will be secured through enforceable requirements within the DCO.</p>	
3.2.6	Dunton Hills Garden Village	<p>The Applicant has taken into account the potential effect of its proposals when developing the route alignment. In this location we have to work within the context of the planning status of other projects, including the Dunton Hills Garden Village proposals.</p> <p>The Applicant has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology</p>	<p>Brentwood Borough Council considers that:</p> <ul style="list-style-type: none"> The Applicant has not adequately assessed the impact of the proposed alignment on the deliverability and viability of DHGV, contrary to Holford Rule 7 and NPS EN-1 and EN-5. Evidence commissioned by Essex County Council (Savills) indicates that overhead pylons could reduce residual land value by approximately £17.5m, materially affecting viability and the ability to deliver affordable housing and infrastructure. 	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>(underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5.</p> <p>The 2024 Design Development Report identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed master planning, would substantially mitigate potential effects on developable land and indirect effects.</p> <p>For the Applicant's position on Dunton Hills Garden Village, please refer to Section 3.8 'Alternatives – Dunton Hills Garden Village' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</p> <p>National Grid provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023REP1-132]. The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'</p>	<ul style="list-style-type: none"> • The proposals undermine Garden Community principles and the design quality required by Policy R01 and R02 of the Brentwood Local Plan. The Council requests that the Applicant: • Demonstrates how the scheme will avoid or mitigate these impacts, including consideration of alternative alignments or undergrounding. • Provides clear commitments within the DCO to safeguard the delivery of DHGV and associated infrastructure. • Engages jointly with Brentwood, Essex, and Basildon to agree measures that protect strategic growth objectives. 	
3.2.7	Sensitivity of land east of Ingatestone	The Applicant has taken into account the potential effect of its proposals when developing the route alignment.	There remains concern that despite the change in the route alignment there is a continued risk of significant adverse heritage, landscape and visual	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>The Applicant has developed its proposal in this area in line with EN-1 and EN-5, the starting assumption being overhead line as the area is not subject to a landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5.</p> <p>Heritage considerations is assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts.</p> <p>6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance.</p> <p>Regarding landscape and visual effects, paragraphs 13.10.1 to 13.10.12 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] provide an assessment of effects on landscape and visual receptors up</p>	<p>effects in this location, highlighting the need for serious consideration of re-routing or <u>undergrounding or alternative solutions by way of mitigation</u> in this area of particular <u>particularly valuable heritage and landscape</u> sensitivity.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>to a distance of approximately 1.5 km from the Ingatestone and Fryerning Visual Receptor Area (VRA). Overall, the Applicant has considered these comments and, whilst respecting the fact that different assessors may reach different judgements, as noted in GLVIA3, the Applicant remains comfortable with the judgements made in the LVIA and the reasoning given.</p> <p>Refer to the Applicant's response to this matter in Table 4.16 ID 6.4.9-50 and Table 4.20 ID 6.59 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>On the basis of the assessments, no change to the technology in this location is proposed.</p>		
Project development process - Consultation				
3.2.8	2022 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the 5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068] the non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	<p>BBC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy.</p> <p>BBC refers to<u>highlighted in</u> its response to this<u>the targeted</u> consultation dated in August 2023 and awaits sight of the Consultation Report to assess<u>and AoCM a number of areas where the consultation responses that were received</u><u>process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.2.9	2023 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the 5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069].</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	<p>BBC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy.</p> <p>BBC refers to <u>highlighted in</u> its response to this <u>the targeted</u> consultation dated in August-2023 and awaits sight of the Consultation Report to assess <u>and AoCM a number of areas where the consultation</u> responses that were received. <u>process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.</u></p>	Agreed
3.2.10	2024 statutory consultation	<p>Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the Statement of Community Consultation (SoCC). Statement of Community Consultation (SoCC). Responses to feedback received during statutory consultation is contained within the 5.1 Consultation Report [APP-066].</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>	<p>BBC acknowledges the statutory consultation was undertaken in accordance with the Statement of Community Consultation.</p> <p>BBC refers to <u>highlighted in</u> its response to this <u>the targeted</u> consultation in July 2024 and awaits sight of the Consultation Report to assess <u>and AoCM a number of areas where the consultation</u> responses that were received. <u>process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.</u></p>	Agreed
3.2.11	2025 targeted	<p>Targeted consultations for Essex took place from 25 February 2025 – 27 March 2025.</p>	<p>BBC acknowledges the targeted consultation was undertaken in accordance with the Consultation</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	consultation	<p>Details of these consultations are outlined in the Targeted Consultation Strategy Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation is contained within the 5.1 Consultation Report [APP-066].</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>Strategy.</p> <p>BBC refers to its response to this consultation in March 2025 and awaits sight of the Consultation Report to assess the consultation responses that were received.</p> <p>BBC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process - including the lack of feedback to the statutory consultation undertaken in summer 2024 - <u>was</u> considered harmful to the transparency and legitimacy of the process.</p>	
Other matters as required				
3.2.12	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 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</p>	<p>BBC Response to Targeted Consultations (March 2025):</p> <p>BBC strongly encourage<u>encouraged</u> NGET to positively respond to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024 particularly having regard to the Government's recently published Community Funds for Transmission Infrastructure.</p> <p>In particular, significant benefits should be realised from N2T for education, skills, and</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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. The Applicant welcomes continued engagement with the National Grid welcomes continued engagement with BBC on this matter.	employment during construction and operation.	

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	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 8.2 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . All relevant legislation, policy and guidance hasve <u>has</u> been identified and appropriately considered to inform the assessment.	BBC supports the ECG position that this issue is agreed. BBC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed

EIA – Approach and Methods

3.3.2 Study area	<p>The study area was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>The<u>BBC agrees that the</u> study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.3.3 Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <u>Section 8.4 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity</u> Revision B<u>Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]</u>.</p> <p>Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p>	<p>BBC supports the ECG position that this issue is agreed apart from in relation to bats<u>agrees that sufficient desktop and</u> survey data which requires further information<u>has been collected to inform the assessment.</u></p>	Agreed
3.3.4 Assessment Methodology	<p>The assessment methodology was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>BBC supports the ECG position that this issue is agreed<u>agrees on the assessment methodology.</u></p>	Agreed
3.3.5 Survey Methodology	<p>The Applicant issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p> <p>All methodologies for surveying licensable species, including water</p>	<p>BBC supports the ECG position that this issue is agreed apart from in relation to survey methodology for bats<u>which requires further information</u><u>agrees on the</u></p>	Agreed

	<p>voles have been agreed with Natural England.</p> <p>Refer to information positions presented in ID 3.3.19.</p>	<p>survey methods and scope for surveys outside the remit of Natural England.</p>	
3.3.6	<p>Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision- BSection 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES- [AS-026]. The key parameters and assumptions presented are considered appropriate.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</p>	<p>BBC supports the current ECC position on this issue that it is under review and that BBC will provide further comment following consideration around reinstatement.</p>	Under discussion
EIA – Baseline Conditions			
3.3.7	<p>The baseline conditions and receptors for Ecology and Biodiversity are presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The baseline conditions and receptors presented are considered appropriate.</p> <p>Further survey information from the 2025 season was submitted to PINS in November 2025, achieving</p>	<p>BBC supports the current ECC position on this issue that it is agreed for all areas apart from in relation to agrees that baseline conditions and receptors for bats which requires further information (see ID3.3.20) presented for</p>	Agreed

coverage of 97% of the Order Limits [AS-026 to AS-045].

Ecology and Biodiversity are appropriate.

EIA – Embedded, Standard and Additional Mitigation Measures

3.3.8 Embedded mitigation

Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.

BBC ~~supports the ECG position that this issue is agreed~~ agrees that embedded mitigation is appropriate and adequate.

Agreed

3.3.9 Standard mitigation

Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and set out in **7.2 Outline Code of Construction Practice [REP2-014REP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.

The Applicant Grid issued the 'Summary of Proposed Protected Species Mitigation' document on ~~16th~~16 January 2025. NG will take on board the comments received from BBC when further developing the mitigation outlined in the ES.

BBC ~~supports the ECG position that this issue is considered agreed for all areas apart from in relation to~~ agrees that standard mitigation for bats (see ID3.3.21) is appropriate.

Agreed

3.3.1

The consideration of additional

BBC ~~supports the ECG~~

Agreed

0	Additional mitigation	<p>mitigation measures are<u>is</u> presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B [AS-026]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>position that this issue is agreed<u>agrees that additional mitigation is appropriate.</u></p>	
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EIA – Assessment Conclusions

3.3.1 1	Construction effects	<p>The assessment of effects during construction is presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The assessment of effects during construction presented is considered appropriate.</p> <p>Tables 8.23 and 8.24 within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] do not restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1–10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance</p>	<p>BBC supports the ECC position on this issue that it is still under discussion for reasons outlined in their SoCG.</p>	Under discussion
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outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated.

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.

The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and at **Deadline 2 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-032]**

[Following a meeting in May 2026 National Grid submitted to the Local Planning Authorities a bat resource compensation proposal for consideration. This includes the provision of bat boxes/veteranisation of 10 % of the bat roosting features lost in any one Project Section.](#)
[The Applicant will continue to engage with BBC on this matter.](#)

3.3.1 2	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].</p> <p>The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>BBC supports the ECC position that this issue is agreed agrees on the <u>presented assessment of effects during operation.</u></p>	Agreed
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Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.3.1 3	<p><u>Outline CoCP</u></p> <p>The <u>7.2 Outline Code of Construction Practice [REP4-164]</u> includes all relevant construction related mitigation measures specified in <u>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</u> and is appropriate for managing construction impacts from the Project. Section 1 of the <u>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</u> states that it should be read alongside the mitigation measures described in the <u>7.2 Outline Code of Construction Practice [REP4-164]</u>.</p> <p>Full details of the ECoW's qualifications / experience will be provided within the Final CoCP which will be approved by the relevant local planning authority. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further details on the ECoW can be found in the Applicant's response to BIO 1.26 in</p>	<p>BBC agrees with the <u>Outline CoCP on relevant mitigation measures and on the provision of further details on the ECoW qualifications/experience and support for the ECoW.</u></p> <p><u>Draft DCO / Outline Management Plans / Mitigation and Monitoring</u></p> <p>The 7.2 Outline Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and is appropriate for managing construction impacts from the Project. Section 1 of the 7.4 Outline Landscape and Ecological Management Plan [REP3-030] states that it should be read alongside the mitigation measures described in the 7.2 Outline Code of Construction Practice [REP3-025].</p> <p>Full details of the ECoW's qualifications / experience will be</p>	<p>BBC supports the ECC position that this matter is still under discussion, and that further clarification is sought around Ecological Clerk of Works.</p>	Agreed
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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.

The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above.

Other matters as required

3.3.1 Biodiversity Net Gain (BNG) – Onsite and
5 Assessment

The Applicant issued the ‘Biodiversity Net Gain Assessment Strategy’ document on 17 January 2025. Comments received were taken on

BBC would like an assurance that BNG initiatives will be relevant to the affected areas of

Under discussion

	<p>board for the BNG assessment in 7.1 Biodiversity Net Gain Report [APP-299].</p> <p>The Applicant is committed to delivering 10 % BNG with wider environmental and societal benefits on its construction projects.</p> <p>While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10% net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit.</p> <p>Further details on the long-term monitoring and management of BNG is provided in response to BIO 1.45 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074]. In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030].</p>	<p>the authority and co-developed with the relevant stakeholders. BBC also supports the ECC position that NG should aim for 20% rather than 10% BNG.</p> <p>BBC would like this matter to remain under discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved.</p>	
<p>3.3.1 Biodiversity Net Gain (BNG) - Offsite 6</p>	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The 7.1 Biodiversity Net Gain Report [APP-299] sets out the approach to BNG. Offsite BNG will be delivered through collaboration with</p>	<p>The CouncilBBC notes that BNG is proposed, which is welcomed in principle, but there is no clarity on how off-site habitat creation will benefit Brentwood or how</p>	<p>Under discussion</p>

partners and purchased from commercially registered providers. Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others. Full details of the offsite solution would be provided to the Local Planning Authorities post-consent. The Applicant has committed to 30 year monitoring and management at the Environmental Areas.

7.1 Biodiversity Net Gain Report [APP-299] details the Applicant's approach and further details regarding the provision of off-site BNG are provided in response to BIO 1.47 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of **8.8.2**

long-term monitoring will be secured beyond the proposed five-year period.

BBC 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.

Applicant's Comments on Local Impact Reports [REP2-030].

See response to ID3.3.15.

3.3.1 Arboriculture Impact Assessment (AIA)
7

The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The tree planting strategy would prioritise replanting within the Order Limits, although off-site provision may be required.

The Applicant issued the draft Arboricultural Impact Assessment in March 2025. The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including appendices B to K [APP-296]** and is considered appropriate for this stage of the project.

The Applicant will be seeking to retain the veteran trees through their detailed design. Commitment GG14 of the **7.2 Outline Code of Construction Practice [REP3-025REP4-164]** states: *'Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.'*

Mitigation and compensation measures for veteran trees and ancient woodland is detailed within **7.4 Outline**

BBC objects to the removal of veteran trees and any direct or indirect impact on ancient woodland within its administrative area. The Council considers that the proposed mitigation is inadequate and fails to comply with EN-1 policy requirements for irreplaceable habitats. While the Applicant proposes a 3:1 replacement planting ratio, this constitutes reinstatement rather than compensation and lacks detail on stock size, biosecurity, and aftercare. BBC therefore requests that the Examining Authority secure enforceable commitments for a full Arboricultural Method Statement, justification for any veteran tree loss, and appropriate compensation measures. Replacement planting

Under discussion

Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].

Paragraph 7.2.41 of the **5.6 Planning Statement [APP-085]** and Section 9.7 of the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-030]** set out the Applicant's position on landscape compensation with final details to be identified within the final LEMP.

The **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms off-site provision for tree replacement may be required; where this is the case, this is considered to be compensation. Landscape compensation measures are considered in relation to the mitigation hierarchy but there is no requirement under policy to compensate for all residual effects. The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then falls to the planning balance.

Regarding minimum standards, the Applicant has provided a response to this matter at Deadline 1 through **8.4**

must meet minimum standards, including 10–12 cm girth stock sourced from biosecure nurseries and maintained in accordance with BS8545. In addition, the Council seeks a strategic tree and woodland compensation package beyond reinstatement to offset residual harm.

	Applicant's Comments on Relevant Representations [REP2-023].		
<p>3.3.1 Data sources (bats) 8</p>	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].</p> <p>Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p> <p>The Applicant has provided a response to this matter at Deadline 1 in 8.4 Applicant's Comments on Relevant Representations [REP2-023].</p> <p>The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed</p>	<p>As for the BBC agrees that sufficient desktop and survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; position pending <u>has now been collected to inform the assessment.</u></p>	<p>Agreed</p>
<p>3.3.1 Survey Methodology (Bats) 9</p>	<p>All methodologies for surveying licensable species have been agreed with Natural England as evidenced within 5.9.13 Draft Statement of Common Ground – Natural England [REP1-034].</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</p>	<p>Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECG believes further survey effort prior to DCO consent is feasible. Enough at height inspection surveys should be possible to facilitate</p>	<p>Agreed</p>

during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.

The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in **8.9.1 Applicant’s Responses to First Written Questions [REP3-074]**. [Natural England advice related to bats is provided in 8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England \[REP4-307\]](#). This letter states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed.

~~The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed.~~

~~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~~ BBC agrees that the survey methodologies agreed with Natural England are appropriate.

3.3.2 Baseline conditions and receptors (Bats)
0

The baseline conditions and receptors for Ecology and Biodiversity are presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B [AS-026]**. The baseline conditions and receptors presented are considered appropriate. 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 as evidenced within **5.9.13 Draft**

BBC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the baseline conditions and receptors for roosting bats requires further information and review.

Under Discussion

Statement of Common Ground – Natural England [REP1-034]. 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.

3.3.2 Standard mitigation (Bats)
1

Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and set out in the **7.2 Outline CoCP-Code of Construction Practice [REP3-025REP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. 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 as evidenced within **5.9.13 Draft Statement of Common Ground – Natural England [REP1-034]**. 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.

Measure B16’s assumption that any action requiring a Natural England derogation licence can be “*reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit*” is considered unsound. ECC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable ‘reasonable anticipation’ of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11. BBC confirmed in meeting regarding

Under discussion

the Statement of Common Ground on 14 January 2026 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	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 7.2 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>This matter remains under discussion pending further review by BBC <u>BBC agrees that all relevant legislation, policy and guidance has been identified.</u></p>	Agreed
EIA – Approach and Methods				
3.4.2	Study area	<p>The study area was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>The <u>BBC agrees with the</u> study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] .	This matter remains under discussion pending further review by BBC BBC agrees that sufficient desktop data has been collected to inform the assessment as presented.	Agreed
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The BBC agrees with the methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] . The key parameters and assumptions presented are considered appropriate.	This matter remains under discussion pending further review by BBC BBC agrees that key parameters and assumptions presented are considered appropriate.	Agreed
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] . The baseline conditions and receptors presented are considered appropriate.	This matter remains under discussion pending further review by BBC BBC agrees that baseline conditions and receptors presented are appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded, standard and additional mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6	BBC is concerned that the proposed construction activities, including the movement of heavy goods vehicles, haul road operations, and extended	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The construction dust assessment in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7. A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] concludes that with the appropriate application of dust mitigation there would likely be no significant effect on sensitive receptors within 250m of the Order Limits. This would include sensitive receptors around Havering Grove.</p> <p>7.2 Outline Code of Construction Practice [REP3-025REP4-164] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304REP4-166] have been prepared to reflect the mitigation measures identified through the construction dust assessment undertaken in 6.7 Environmental Statement Chapter 7 - Air Quality (Final Issue A) [APP-147] and 6.7. A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]. These mitigations measures already include dust suppression measures and restrictions on vehicle idling.</p> <p>Site-specific controls such as tailored monitoring at high-risk locations would be</p>	<p>working hours, will lead to increased emissions and dust generation, adversely affecting local air quality. These impacts are likely to be most pronounced near sensitive receptors such as residential areas, schools, and recreational spaces, particularly around Havering Grove. While the ES identifies mitigation measures, the Council considers these insufficient given the scale and duration of the works. The Council requests that the Examining Authority secure enforceable commitments for robust air quality management, including continuous monitoring at agreed locations, dust suppression measures, and restrictions on vehicle idling, to ensure compliance with national air quality objectives and protect public health.</p> <p><u>agrees that embedded, standard and additional mitigation is considered appropriate and adequate.</u></p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>refined in finalised versions of the Code of Construction Practice and Dust Management Plan prepared by the Main Works Contractor(s). Responsibility for any monitoring undertaken would sit with the Main Works Contractor(s). The final versions of the Outline CoCP and Dust Management Plan would be submitted for approval in accordance with Requirement 4 of 3.1 Draft Development Consent Order [REP3-004REP4-037] prior to commencement of development.</p>		
EIA – Assessment Conclusions				
3.4.10	Construction effects	<p>The assessment of effects during construction is presented 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]. Dust monitoring and dust suppression are included. The construction dust assessment was carried out in line with the IAQM construction dust assessment guidance. Dust is likely to be generated by the Project and mitigation is designed so there would be no significant effect on sensitive receptors, including those around Havering Grove.</p> <p>The mitigation measures specified are aligned with industry standard best practice IAQM construction dust guidance and are considered appropriate for the level of dust</p>	<p>BBC is concerned that the proposed construction activities, including the movement of heavy goods vehicles, haul road operations, and extended working hours, will lead to increased emissions and dust generation, adversely affecting local air quality. These impacts are likely to be most pronounced near sensitive receptors such as residential areas, schools, and recreational spaces, particularly around Havering Grove. While the ES identifies mitigation measures, the Council considers these insufficient given the scale and duration of the works. The Council requests that the Examining Authority secure enforceable commitments for robust air quality management, including continuous monitoring at agreed locations, dust suppression measures, and restrictions on vehicle idling, to ensure compliance with national air quality objectives and protect public health. <u>agrees with the assessment</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>risk impact anticipated from the Project.</p> <p>There is scope in the 7.2 Outline Code of Construction Practice [REP3-025][REP4-164] for agreeing location specific mitigation measures once construction activities and locations are further developed through detailed design.</p> <p>Refer to the Applicant's positions presented 3.4.7 above.</p>	<p><u>of effects during construction and proposed mitigation measures, and notes that there will be no significant effects on sensitive receptors, in particular those around Havering's Grove.</u></p>	
3.4.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 7.7 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147].</p> <p>The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter.</p>	<p>This matter remains under discussion pending further review by BBCBBC agrees that the assessment of effects during operation that has been presented is appropriate.</p>	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	<p>7.2 Outline Code of Construction Practice [REP3-025][REP4-164] includes all relevant mitigation measures specified in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150].and is appropriate for managing construction impacts from the Project.</p> <p>Refer to the Applicant's positions presented 3.4.7 above.</p>	<p>BBC is concerned that the proposed construction activities, including the movement of heavy goods vehicles, haul road operations, and extended working hours, will lead to increased emissions and dust generation, adversely affecting local air quality. These impacts are likely to be most pronounced near sensitive receptors such as residential areas, schools, and recreational spaces, particularly around Havering Grove. While the ES identifies mitigation measures, the Council considers these insufficient given</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			<p>the scale and duration of the works. The Council requests that the Examining Authority secure enforceable commitments for robust air quality management, including continuous monitoring at agreed locations, dust suppression measures, and restrictions on vehicle idling, to ensure compliance with national air quality objectives and protect public health.</p> <p><u>agrees that relevant mitigation measures included on OCoCP is appropriate for managing construction impacts from the Project.</u></p>	

Other matters as required

3.5 Noise and Vibration

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 14.2 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately</p>	<p>This matter remains under discussion pending further review by BBC<u>BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		considered to inform the assessment.		
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The BBC agrees with the study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] .	This matter remains under discussion pending further review by BBC <u>BBC agrees that sufficient desktop data has been collected to inform the assessment.</u>	Agreed
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the Environmental Impact Assessment (EIA) in 6.19 Scoping Report [APP-288 to APP-296] received from the Planning Inspectorate.	The BBC agrees with the methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] . The key parameters and assumptions presented are considered appropriate.	This matter remains under discussion pending further review by BBC <u>BBC agrees that the key parameters and assumptions presented are considered appropriate.</u>	Agreed
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration	This matter remains under discussion pending further review by BBC <u>BBC agrees that the baseline conditions and receptors are considered appropriate.</u>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>[APP-256]. The baseline conditions and receptors presented are considered appropriate.</p>		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	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 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.</p> <p><u>Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</u></p>	<p>The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.</p> <p>BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</u></p> <p>Suitable noise and vibration control measures are detailed in the ES, the 7.2 Outline Code of Construction Practice [REP3-025], and the 7.2 Outline Code of Construction Practice Appendix F-- Outline Noise and Vibration Management Plan [APP-306]. The Outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice [REP3-025REP4-164] includes for pre- and post-condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or</p>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>otherwise) deemed to be caused by the works.</p> <p>The Applicant has provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023].</p>		
3.5.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 14.6 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and set out in the 7.2 Outline Code of Construction Practice [REP3-025REP4-164].</p> <p>The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.</p> <p>Suitable <u>Further detailed construction noise and vibration control measures are detailed in the ES, the assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of 7.2 Outline Code of Construction Practice [REP3-025], and</u></p>	<p>The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.</p> <p>BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>theREP4-165]. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306][REP4-165]. Refer to the Applicant's positions presented 3.5.7 above. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</p>	<p>protocol for affected property owners to report concerns and seek remedial action.</p>	
3.5.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 14.6 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.</p> <p>Suitable <u>Further detailed construction noise and vibration control measures are detailed in the ES, the assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of 7.2 Outline Code of Construction Practice [REP3-025], and the REP4-165]. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306][REP4-165]. Refer to the Applicant's positions presented 3.5.7 above.</u> <u>With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of 7.2 Code of Construction</u></p>	<p>these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.</p> <p>BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Practice [REP4-165]), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</p>		
EIA – Assessment Conclusions				
3.5.10	Construction effects	<p>The assessment provided in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] indicates that no significant effects from noise or vibration, during either the construction or operational phases, are expected in the Brentwood Borough Council area. Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole. The Applicant has provided a response to this matter at Deadline 1 in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023].</p> <p>The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.</p> <p>Suitable Further detailed construction noise and vibration control measures are detailed</p>	<p>The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.</p> <p>BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>in the ES, the 7.2 Outline of Construction Practice [REP3-025 and the assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. [REP4-165].</p> <p><u>The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</u></p> <p><u>With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</u></p>	<p>Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 14.7 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	This matter remains under discussion pending further review by BBC BBC agrees that the assessment of effects during operation and maintenance presented is considered appropriate .	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP3-025] includes all relevant mitigation measures specified in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and is appropriate for managing construction impacts from the Project.</p> <p>Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</p> <p>With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be</p>	<p>The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.</p> <p>BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of 7.2 Code of Construction Practice [REP4-165]).</u> <u>temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of 7.2 Code of Construction Practice [REP4-165].</u></p> <p>The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.</p> <p>Refer to the Applicant's positions presented 3.5.7 above.</p>	<p>pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.</p>	

Other matters as required

3.6 Health and Wellbeing

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 10.2 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>This matter remains under discussion pending further review by BBC <u>BBC agrees that the relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	Agreed
EIA – Approach and Methods				
3.6.2	Study area	<p>The study area was agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024.</p>	<p>The study area was agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024.</p> <p>No comments received from BBC on the Health and Wellbeing Refreshed Approach – Technical Note to date. It is therefore assumed that the study area is agreed. <u>BBC agrees with the study area.</u></p>	Agreed
3.6.3	Data sources	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192].</p>	<p>This matter remains under discussion pending further review by BBC <u>BBC agrees that sufficient desktop data has been collected to inform the assessment as presented.</u></p>	Agreed
3.6.4	Assessment methodology	<p>A meeting was held on 24 September 2024 to agree the assessment methodology of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</p> <p>The Methodology was also agreed through</p>	<p>A meeting was held on 24 September 2024 to agree the assessment methodology of the Health and Wellbeing ES chapter.</p> <p>The Methodology was also agreed through the Health and Wellbeing Refreshed Approach –</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024.	Technical Note issued in October 2024. There were no comments, correspondence or objections from BBC following the meeting on 24 September, therefore it is assumed that the assessment methodology is agreed. <u>BBC agrees with the assessment methodology.</u>	
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] . The key parameters and assumptions presented are considered appropriate.	This matter remains under discussion pending further review by BBC <u>BBC agrees that the key parameters and assumptions presented are considered appropriate.</u>	Agreed
EIA – Baseline Conditions				
3.6.6	Baseline conditions, receptors and mitigation (embedded, standard, additional)	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] . The baseline conditions and receptors presented are considered appropriate. The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: <ul style="list-style-type: none"> Monday to– Friday: 07:00 to 19:00 Saturday, Sunday and Bank Holidays / Public Holidays: 07:00 to 17:00 Saturdays, Sundays and Bank Holidays: 07:00 to 17:00. 	BBC is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of the 3.1 Draft Development Consent Order [REP3-004REP4-03] (draft DCO).</p> <p>The assessment within the ES (Volume 6 of the DCO application) is based on a set of parameters which includes the core working hours for the construction phase of the Project.</p> <p>The Noise and Vibration assessment 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] 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 the 7.2 Outline Code of Construction Practice, [REP3-025REP4-164], significant effects from noise and vibration during the construction phase are not anticipated. The measures set out within the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 the draft DCO [APP-056 REP2-004REP4-037] within the final CoCP.</p>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>The Traffic and Transport assessment 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] assessed the impact of construction traffic on sensitive receptors. The assessment concluded that, with the embedded mitigation and controls set out in the 7.3 Outline Construction Traffic Management Plan [REP3-028REP4-174] (Outline CTMP), significant effects are not anticipated. The measures set within the Outline CTMP will be secured via Requirement 4(1)(b) (Construction Management Plans) of 3.1 draft DCO [REP3-004REP4-037] the draft DCO within the final CTMP.</p> <p>For further context, 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 mean 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>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>The defined core working hours provide essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and public holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints.</p> <p>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</p> <p>Any blanket restrictions on weekend and public holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop start working, and a longer overall construction period, which would itself result in greater</p>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>long term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.</p> <p>The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO controls to manage impacts included in Table 6.1 of the 7.2 Outline Code of Construction Practice [REP3-025REP4-164], including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).</p> <p>Refer to Table 4.14 ID 6.45, 6.46 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] for further information.</p>		
EIA – Assessment Conclusions				
3.6.7	Construction effects	The assessment of effects during construction is presented in Section 10.7 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] .	BBC is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>The assessment of effects during construction presented is considered appropriate.</p> <p>Paragraph 10.4.28 in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes as part of the limitations of the assessment that health effects are considered at a population, rather than an individual level. Whilst it is acknowledged that there are individuals along the Project route with different health needs and vulnerabilities, effects are presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant for particular effects. This population-based approach is consistent with health impact assessment methodologies and is proportionate and appropriate for a project of this scale and nature.</p> <p>The approach to identifying vulnerable groups (including individuals with protected characteristics, which include those with various types of disability or health need) has been set out in paragraph 10.4.19 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192].</p> <p>See response to ID 3.6.6 in relation to mitigation relating to noise and vibration.</p>	<p>to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.</p>	
3.6.8	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 10.7 of 6.10 Environmental Statement</p>	<p>This matter remains under discussion pending further review by BBC <u>BBC agrees that the assessment of effects during operation and</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Chapter 10 - Health and Wellbeing [APP-192]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	maintenance presented is considered appropriate.	

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.6.9	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP3-025REP4-164] includes all relevant mitigation measures specified in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October to agree on the structure for the 7.2 Outline Code of Construction Practice [REP3-025REP4-164]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>See response to ID 3.6.6.</p>	BBC is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.	Under discussion
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Other matters as required

3.7 Historic Environment

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.7.1	Policy and legislation (Archaeology)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 11.2 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Refer to Table 4.16 ID 6.21, 6.49-50, 6.51, 6.52 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] for further information.</p>	<p>BBC supports ECC's (Archaeology) current review of the relevant documentation and that the ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance.</p> <p>Further information will be included in the LIR. <u>BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	Agreed
3.7.2	Policy and legislation (Built Heritage)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 11.2 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The Applicant notes the LPAs request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with the Scoping Report (6.19 Scoping Report [APP-288 –</p>	<p>BBC supports the BBC (Built Heritage) position <u>agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment and</u> that based on a further review of the identification and assessment of the value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209] we are able to agree this matter, <u>relevant policy regarding impacts to NDHA has also been complied with.</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>APP-296], Scoping Opinion (6.20 Scoping Opinion [APP-297]) and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/ significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.</p>		
EIA – Approach and Methods				
3.7.3	Study area	The study area was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and	The study area was agreed through the EIA- Scoping Report and Scoping Opinion received-	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p> <p>The study area was also agreed through thematic group meetings where further comments were addressed.</p>	<p>from the Planning Inspectorate.</p> <p>The study area was also agreed through thematic group meetings where further comments were addressed. <u>BBC agrees with the study area identified.</u></p>	
3.7.4	Data sources (Built Heritage)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].</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. The 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is organised geographically and by period and includes baseline information on non-designated historic buildings.</p>	<p>BBC supports the ECC position that this issue is agreed <u>agrees that sufficient desktop and survey data for Built Heritage has been collected to inform the assessment as presented.</u></p>	Agreed
3.7.5	Data sources (Archaeology) - Desktop	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].</p>	<p>BBC supports the ECC position that this issue is agreed <u>agrees that sufficient desktop data for Archaeology has been collected to inform the assessment as presented.</u></p>	Agreed
3.7.6	Data sources (Archaeology)	<p>The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of</p>	<p>BBC supports the ECC position: ECC notes <u>maintains that</u> the fieldwork proposed prior to application has not <u>yet</u> been completed and</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	- Survey data	<p>the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 – Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been <u>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. It is intended to submit the report of the phase 2 geophysics that has been completed up to the 17 April 2026 into Deadline 6 (7.7.26) of the Examination. This would then represent a combined total of 92% (approximately 2050ha) of the overall geophysical survey area and the area of intrusive impact for the</u></p>	<p>the impact of this to inform the assessment <u>is remains</u> under review. This matter <u>therefore remains under discussion and review and also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to Agreed.</u></p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>Project.</u></p> <p>completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> <p><u>Archaeological trial trenching had been completed for 89% of priority areas (approximately 3000 trenches) 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 was largely completed 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.</u></p> <p>The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant</p>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</u></p>		
3.7.7	Assessment methodology (Built Heritage)	<p>The methodology for assessing Historic Environment was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p> <p>The 6.20 Scoping Opinion [APP-297] stated: <i>'The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.'</i></p> <p>The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and November 2024.</p> <p>BBC comments noted and Historic Environment Viewpoints feedback has been taken into account for the assessment.</p> <p>The Applicant's position regarding non-designated heritage assets is as outlined in Section 3.6.1 (Policy and Legislation) above.</p>	<p>BBC wishes <u>agrees that the methodology for assessing Historic Environment has been agreed through the Scoping Opinion and discussed at Thematic Group Meetings, but continues</u> to highlight the section at Ingatestone Hall within close proximity to Heron Hall as being one of <u>particular</u> historic sensitivity. The preferred route as proposed will pose a significant impact on the setting of these listed buildings and potentially have a direct impact for significant Ancient Monuments and archaeological deposits. BBC stresses <u>has therefore stressed</u> the importance of a full assessment of the impact of the proposal on the historic, architectural, and <u>in particular the</u> associative value of these heritage assets (above and below ground) and, as well as all other affected heritage assets across the route. On this matter, BBC request NGET seek detailed advice with the regional team at Historic England.</p> <p>Historic Environment Viewpoints feedback received on 4th March 2025 from BBC. BBC (Built Heritage) is in agreement with this matter.</p>	Agreed
3.7.8	Assessment	The methodology for assessing Historic	BBC supports the ECG position that this issue-	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	Methodology (Archaeology)	Environment was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	is agrees that the methodology for assessing Historic Environment has been agreed <u>as set out</u> .	
3.7.9	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The key parameters and assumptions presented are considered appropriate.	BBC supports the position that this matter is agreed following review of the ES agrees that key parameters and assumptions presented are <u>considered appropriate</u> .	Agreed
3.7.10	Key parameters and assumptions (Archaeology)	<p><u>The fieldwork undertaken to date (see response to 3.7.6) comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</u></p> <p><u>The Applicant has provided a response to this matter at Deadline 3 is response to HE 1.43 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</u></p> <p><u>The assessment presented in 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210] has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been</u></p>	<p>BBC supports the ECC (Archaeology) is currently reviewing the ES Chapter. Until <u>position that until</u> 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>" <u>This matter remains under discussion and review also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to Agreed.</u></p>	Under Discussion

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		<p><u>confirmed by field evaluation. This situation is common for all types of development. There are measures in place through Requirement 5 of 3.1 Draft Development Consent Order [REP4-037] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology.</u></p> <p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The key parameters and assumptions presented are considered appropriate.The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the</p>		

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		<p>historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been Further details can be found in response to ID 4.13.25 and 8.238 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> <p>The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The Applicant considers that through ongoing engagement between the parties, this matter can be</p>		

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
<u>moved to Agreed.</u>				
EIA – Baseline Conditions				
3.7.11	Baseline conditions and receptors (Built Heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The baseline conditions and receptors presented are considered appropriate.	BBC supports the ECC position that this issue is agreed <u>agrees that the Built Heritage baseline conditions and receptors presented are considered appropriate.</u>	Agreed
3.7.12	Baseline conditions and receptors (Archaeology)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The baseline conditions and receptors presented are considered appropriate.	BBC supports the ECC position that this issue is agreed <u>agrees that the Archaeology baseline conditions and receptors presented are considered appropriate.</u>	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.13	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. <u>April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project to the</u>	BBC supports the ECC position on this issue: <u>in that</u> ECC (Archaeology) agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however, but that 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 <u>matter remains under discussion and review also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to</u>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>Archaeology Working Group including HE, ECC, SCC and NCC.</u></p> <p><u>May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] with the intention that any further comments can be addressed and included for submission at Deadline 5.</u></p> <p><u>The evaluation of the 400kV underground cable is complete and reporting for the final areas completed in 2026 is underway. No significant areas of archaeology have been identified that were not already included in baseline and assessment.</u></p> <p>Matter remains under discussion for archaeology.</p>	<p><u>Agreed.</u></p>	
<p>3.7.14 <u>a3.7.14</u> <u>a</u></p>	<p>Standard mitigation (Built Heritage)</p>	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and set out in the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] 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</p>	<p>BBC supports the ECC position on this issue. This matter is agreed with regards to commitment H06. BBC agrees that the standard mitigation is <u>considered appropriate and adequate in terms of its nature and scale to address potential effects.</u> BBC also agrees with commitment H06 and the <u>understanding of the term 'appropriate'.</u></p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>(such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [REP3-030]. Specifically, this means:</p> <p>Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature</p> <p>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists</p> <p>Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible</p> <p>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.</p>		
<p>3.7.14 <u>3.7.14</u> <u>b</u></p>	<p>Standard mitigation (Built Heritage)</p>	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11</p>	<p>BBC supports the ECC position on this issue. <u>In that whilst</u> Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to</p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Historic Environment [AS-068] and set out in the 7.2 Outline Code of Construction Practice [REP3-025] the standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Regarding H07 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate.</p> <p>Further details regarding construction vibration effects on listed buildings have been provided in response to ExQ1 HE 1.11: of 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and 8.17 Response to Rule 17 Letter - Historic Environment [REP4-318].</p> <p>As outlined in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and</p>	<p>the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling), we would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners.</u></p> <p><u>In addition, 7.2 Outline Code of Construction Practice [REP4-164], commitment GG30 includes:</u></p> <p><u>“A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken.”</u></p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</u></p>		
3.7.15	Standard mitigation (Archaeology)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and set out in 7.2 Outline Code of Construction Practice [REP3-025 REP4-164].</p> <p>The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BBC supports the ECC position that this issue is agreed <u>agrees that standard mitigation is considered appropriate and adequate in terms of its nature and scale to address potential effects.</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.7.16	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 11.6 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project to the Archaeology Working Group including HE, ECC, SCC and NCC.</u></p> <p>The <u>May 2026, following stakeholder feedback, the</u> Applicant is currently preparing <u>has re-issued</u> an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] taking into account feedback received from stakeholders. <u>The updated document is scheduled with the intention that any further comments can be addressed and included</u> for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review.</p>	<p>BBC supports the ECC position that the <u>The</u> 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.</p> <p>ECC noted during call in January 2026 that this matter is not relevant for Built Heritage.</p>	Under discussion
EIA – Assessment Conclusions				
3.7.17	Construction effects (Built Heritage)	The assessment of effects during construction is presented in Section 11.7 of	BBC supports the ECC position that this issue is agreed <u>agrees that the assessment of effects on</u>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment of effects during construction presented is considered appropriate.</p>	<p><u>Built Heritage during construction presented is considered appropriate.</u></p>	
3.7.18	Construction effects (Archaeology)	<p>The assessment of effects during construction is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment of effects during construction presented is considered appropriate.</p>	<p>This section is currently under review (ECC-Archaeology) Email 4th 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 6th Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, BBC (Archaeology) confirmed agreement on this matter during call in January 2026. <u>BBC agrees that the assessment of effects on Archaeology during construction presented is considered appropriate.</u></p>	Agreed
3.7.19	Operational (and maintenance) effects (Built Heritage)	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment of effects during operation (and maintenance) presented is considered appropriate. NG have considered the positioning of this pylon through the design process and have avoided placing pylons in one of the intentional view corridors from the Grade II listed Church of St Mary and Dunton Hall. However, other constraints have meant it</p>	<p>BBC Statutory Consultation response: The positioning of pylon TB226 will profoundly impede upon intentional view corridors which are specified in the SPD, from the Church of St Mary to the historic Farmstead and onwards to the Church of All Saints. Despite the Council having previously raised this concern during the non-statutory consultation stages, to date this unacceptable impact has not been addressed, nor is the Council aware of any correspondence with Historic England specifically on this issue. The Council recognises and expects that to achieve a satisfactory outcome this will require</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>has not been possible to reposition pylons out of all view corridors. Historic England have been consulted on all elements of the Project design, however they have not commented on Grade II listed buildings as this falls under the remit of the Local Planning Authorities. Due to the level of expected harm and in line with current policy, NG are unable to accommodate moving the position of this pylon without creating direct effects to the development footprint or moving closer to other heritage assets.</p>	<p>effective collaboration between NGET, Historic England and the Council. BBC supports the ECC position that this issue is agreed. <u>BBC agrees with the assessment of effects for Built Heritage during operation and maintenance presented is considered appropriate.</u></p>	
3.7.20	Operational (and maintenance) effects (Archaeology)	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>Following review of the ES, ECC confirmed agreement on this matter during call in January 2026 <u>BBC agrees that the assessment of effects for Archaeology during operation and maintenance presented is considered appropriate.</u></p>	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.21	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP3-025REP4-164] includes all relevant construction mitigation measures specified in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October to agree on the structure for the 7.2 Outline Code of ConstructioConstruction Practice</p>	<p>BBC supports the ECC position that this issue is under review for Archaeology and that 3.7.8 covers the position for Built Heritage. Further comments will be included within the LIR which require action. <u>BBC agrees that with new wording following comments in LIRs and Written Representations, that the OCoCP is appropriate for managing relevant construction impacts from the project.</u></p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>[REP3-025][REP4-164]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>See 3.6.14 and 3.6.15 for current position.</p> <p>The CoCP was updated following comments received in LIRs and Written Representations.</p>		
Other matters as required				
3.7.22	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	<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>TheBBC agrees that 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
3.7.23	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>TheBBC agrees that the scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed
3.7.24	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is considered appropriate and proportionate to the level of evaluation required.</p> <p>April 2025, The Applicant issued the Draft</p>	<p>BBC supports the ECC position on this issue that the Outline AMS-WSI is currently not agreed. This matter remains under discussion and review and also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to Agreed.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project to the Archaeology Working Group including HE, ECC, SCC and NCC.</u></p> <p><u>The</u> May 2026, following stakeholder feedback, the Applicant will update <u>has re-issued an updated version of</u> 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England and will consider any detailed comments provided in Local Impact Reports <u>with the intention that any further comments can be addressed and included for submission at Deadline 5.</u></p>		
3.7.25	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</p>	<p>The <u>BBC agrees that the</u> programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>		

3.8 Landscape and Visual

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 13.2 of Chapter 13 (Landscape and Visual) 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><u>The Applicant notes that this matter can be agreed between both parties based on a</u></p>	<p>BBC supports the current ECC position on this issue.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	<p>Under discussion <u>Agreed</u></p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		meeting to discuss the Statement of Common Ground with ECC on 20th May 2026.		
EIA – Approach and Methods				
3.8.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>TheBBC agrees with the study area for assessing Landscape and Visual that was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p>	Agreed
3.8.3	Data sources	<p>Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>As per the response given to ECC: The request for 1:10,000 scale mapping for 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243] was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure. Each LVIA visualisation in 7.12 Visualisations [APP-343 to APP-351] is accompanied by a location map on 1:25,000 OS mapping with the field of view also indicated on the figure. The viewpoint assessment in Annex a of 6.13.A3 Environmental Statement Appendix 13.3 -</p>	<p>BBC supports the current ECC position on this issue. Following a meeting held in January 2026, their position on this matter is unchanged.</p>	<p>Under-discussion Agreed</p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Visual Baseline and Assessment [APP-229 to APP-232] is accompanied by 1:25,000 OS mapping and aerial imagery.</p> <p><u>The Applicant suggests that the study area apart from those within the context of the viewpoints can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20th May 2026.</u></p>		
3.8.4	Assessment methodology (including LVIA methodology)	<p>The outline methodology for assessing Landscape and Visual was agreed through the 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate and through subsequent thematic workshops</p> <p>The LVIA methodology is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227].</p> <p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28th November 2024 to follow up any additional changes to the assessment.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</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>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28th November 2024 to follow up any additional changes to the assessment.</p> <p>BBC provided comments on the proposed viewpoints in Essex South in an E-mail on 25th October 2025. Viewpoints are still under discussion.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>The Applicant suggests that the matter of the assessment methodology apart from those within the context of the viewpoints can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20th May 2026.</u></p>		
3.8.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The key parameters and assumptions presented are considered appropriate.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'</p>	<p>The ES acknowledges significant adverse effects within 0.5 km of the overhead line, but the Council considers that major adverse impacts will extend up to 1 km and moderate adverse effects up to 1.5 km, particularly in open, semi-enclosed landscapes such as the Brentwood Hills and Dunton Settled Claylands. Even beyond these distances, the cumulative effect of multiple pylons and the continuous overhead linear character of the project will industrialise rural landscapes and erode scenic beauty, tranquillity, and sense of place, contrary to GLVIA3 guidance and National Policy Statement EN-1 (paras 4.3.4 and 5.10.6).</p> <p>Key concerns:</p> <ul style="list-style-type: none"> • LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km. • LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community. • VRA G1 Ingatestone & Fryerning – significant adverse effects on PRoW (St Peter's Way) 	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			<p>and heritage settings.</p> <ul style="list-style-type: none"> • VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village. <p>BBC objects to the proposed overhead line alignment within its administrative area due to unacceptable landscape and visual harm, incompatibility with strategic growth objectives, and failure to comply with EN-1 policy requirements. The Council seeks undergrounding in sensitive areas and a strategic compensation package as a minimum. The Council requests that the Examining Authority secure enforceable requirements within the DCO for undergrounding in sensitive locations (particularly Brentwood Hills and DHGV) and a strategic landscape compensation package to offset residual harm. Following a meeting held in January 2026, their position on this matter is unchanged.</p>	

EIA – Baseline Conditions

3.8.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The baseline conditions and receptors presented are considered appropriate.</p> <p>The Applicant has provided responses to concerns raised in Appendix F of 8.4.1 Applicant's Comments on Relevant Representations and also in Table 4.20</p>	<p>The ES acknowledges significant adverse effects within 0.5 km of the overhead line, but the Council considers that major adverse impacts will extend up to 1 km and moderate adverse effects up to 1.5 km, particularly in open, semi-enclosed landscapes such as the Brentwood Hills and Dunton Settled Claylands. Even beyond these distances, the cumulative effect of multiple pylons and the continuous overhead linear character of the project will industrialise rural landscapes and erode scenic beauty, tranquillity, and sense of</p>	Under discussion
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ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>Section 3.8 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out the Applicants response to concerns related to the Project and proposed Dunton Hills Garden Village.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</p>	<p>place, contrary to GLVIA3 guidance and National Policy Statement EN-1 (paras 4.3.4 and 5.10.6).</p> <p>Key concerns:</p> <ul style="list-style-type: none"> • LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km. • LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community. • VRA G1 Ingatestone & Fryerning – significant adverse effects on PRoW (St Peter's Way) and heritage settings. • VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village. <p>BBC objects to the proposed overhead line alignment within its administrative area due to unacceptable landscape and visual harm, incompatibility with strategic growth objectives, and failure to comply with EN-1 policy requirements. The Council seeks undergrounding in sensitive areas and a strategic compensation package as a minimum. The Council requests that the Examining Authority secure enforceable requirements within the DCO for undergrounding in sensitive locations (particularly Brentwood Hills and DHGV) and a strategic landscape compensation package to offset residual harm.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and also paragraphs 13.6.2 to 13.6.4 in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>As described in the 5.15 Design Development Report [APP-119] (from page 114 onwards) it is the Applicant's view that adopting the alignment of the existing 132 kV overhead line (by placing this section of the 132kV underground and using the vacant corridor for the 400kV alignment) from the north of Bushwood Farm and across the A129 would not be appropriate. This alignment, if used for the 400 kV connection, would cross the grounds of a school and require additional tree removal and management to create the necessary cleared corridor for a 400 kV alignment. It is</p>	<p>BBC Statutory Consultation response:</p> <p>The proposed routing of the overhead line to the northern, western and southern boundary of Haverings Grove serves to create a harmful severing effect, acting as an imposing physical barrier on the landscape between this settlement and Hutton. BBC wish to highlight the unacceptable impacts of overhead lines in this location and the need for serious consideration of re-routing or undergrounding of the route around Haverings Grove.</p> <p>Notwithstanding the above, the Council considers that there are opportunities for the Norwich to Tilbury project to facilitate the removal of the 132kV pylon line, running to the west of Haverings Grove, operated by UK Power Networks (UKPN), to reduce the cumulative visual impact of energy infrastructure in this location and, to some extent, compensating for the additional visual impact of the new Norwich to Tilbury 400kV power lines. The Council recognises, and expects, that this will require effective collaboration between NGET, UKPN and Ofgem.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>however proposed to replace a 2 km section of the 132 kV overhead line from north of Bushwood Farm to south of Creasey's Farm with underground cable. Modification to the 400kV arrangement were also made following the Statutory Consultation. The modification occurs southwards from the A129 and changed the angle pylon to a suspension to move the pylons and the alignment further to the south of Havering's Grove to reduce effects.</p> <p>The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</p>		
3.8.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of Chapter 13 (Landscape and Visual) [APP-226] and set out in the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through</p>	<p>BBC supports the current ECC position on this issue.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>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 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and the 7.2 Outline Code of Construction Practice [REP3-025REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</p>		
3.8.9	Additional mitigation	<p>Additional mitigation comprises measures over and above any embedded and standard mitigation measures.</p> <p>The consideration of additional mitigation measures are presented in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual) [APP-226]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The consideration of additional mitigation measures are presented in</p>	<p>BBC supports the current ECC position on this issue.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out the Applicant's approach to the mitigation hierarchy for the Project.</p> <p>The Applicant's position on landscape mitigation is also set out in Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.</p>		
EIA – Assessment Conclusions				
3.8.10	Construction effects	<p>The assessment of effects during construction is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>The assessment of effects during construction presented is considered appropriate.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this</p>	<p>BBC supports the current ECC position on this issue.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		matter. Further detail on vegetation loss within each LCA or LCT will be provided by the Applicant.		
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC supports the current ECC position on this issue. Following a meeting held in January 2026, their position on this matter is unchanged.	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	The 7.2 Outline Code of Construction Practice [REP3-025REP4-164] includes all relevant construction related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and is appropriate for managing construction impacts from the Project. Meeting held on 9 th October 2024 to agree on the structure for the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] . A further meeting was held on 29 th January 2025 to address comments from stakeholders.	BBC supports the current ECC position on this issue. Following a meeting held in January 2026, their position on this matter is unchanged.	Under discussion
3.8.13	Outline LEMP	The 7.4 Outline Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and is	BBC email on 23 rd October 2024 regarding the draft outline LEMP: BBC noted that clarity is needed on the differences between Mitigation Areas, Environmental Areas, Landscape and Visual Mitigation.	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>appropriate.</p> <p>The Applicant confirms that the Environmental Areas provide landscape and visual mitigation and will be managed for BNG for 30 years.</p> <p>Section 3.12 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out the approach for 3:1 replacement planting for individual trees and small groups of individual trees.</p> <p>The Applicant considers that the delivery of on-site (within the Order Limits) reinstatement planting comprises reinstatement/ mitigation, but the delivery of off-site (outside the Order Limits) planting under the 3:1 commitment would comprise compensation. A five-year adaptive aftercare period for replacement planting outside Environmental Areas is proposed.</p> <p>The Applicant has also provided responses to concerns raised related to aftercare of replacement planting and mitigation within Environmental Areas in Table 4.20 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>Meeting held on 9th October to agree on the structure for the 7.4 Outline Landscape and Ecological Management Plan [REP3-030]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p> <p>Comments received from EPS were taken</p>	<p>BBC noted that discussion is needed on how long replacement planting, landscape and visual mitigation and compensatory planting will be cared for.</p> <p>BCC noted that the Councils would want to see an ongoing role/consultation in the monitoring of any replacement, mitigation or compensatory planting to ensure long term success.</p> <p>Following a meeting held in January 2026, their position on this matter is unchanged.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>on board and addressed in the following iteration of the 7.4 Outline Landscape and Ecological Management Plan [REP3-030].</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'</p>		

Other matters as required

3.9 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 15.2 of Chapter 15 (Socio-economics, Recreation and Tourism) [APP-265] of the ES.</p> <p>All relevant legislation, policy and guidance</p>	<p>BBC supports the ECC position on this issue <u>agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</u></p>	<p>Under-discussion <u>Agreed</u></p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.9.2	Study area	<p>The 6.20 Scoping Opinion [APP-297] stated: <i>“The Applicant should seek to agree the study area with the relevant local authorities”</i>.</p> <p>A meeting was held on 14th November 2024 to seek to agree this point in the 6.20 Scoping Opinion [APP-297]. Technical Notes were shared in June 2023 and April 2024.</p> <p>Following the meeting held on 14th November, it was agreed that the study area for businesses would be expanded from 1 km to 3 km to take into account potential visual effects on businesses.</p> <p>The 3rd technical note was issued to BBC on 28th March 2025 to seek to agree on the study area and methodology.</p>	<p>No comments received to date on the Technical Notes.</p> <p>During the Thematic Group meeting in November 2024, it was proposed that the study area for businesses was increased from 1 km to 3 km to account for visual effects on businesses. BBC agrees with the study area.</p>	Agreed
3.9.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265].</p>	<p>BBC supports the ECC position on this issue agrees that sufficient desktop and survey data has been collected to inform the assessment as presented.</p>	Under discussion Agreed
3.9.4	Assessment methodology	<p>The 6.20 Scoping Opinion [APP-297] stated <i>“The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to</i></p>	<p>No comments from BBC on the technical note agrees with the assessment methodology.</p>	Under discussion Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><i>agree these with relevant local authorities”.</i></p> <p>A meeting was held on 14th November 2024 to seek to agree this point in the Scoping Opinion.</p> <p>A 3rd Technical Note was prepared to seek to agree the study area and methodology, therefore this area is still under discussion.</p> <p>The 3rd technical note was issued to BBC on 28th March 2025 to seek to agree on the study area and methodology.</p> <p>The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as ‘not agreed’</p>		
3.9.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. The key parameters and assumptions presented are considered appropriate.</p> <p>BBC comments are noted, and National Grid will continue to engage with BBC on this matter.</p> <p>The scale of construction employment arising from the Project is modest, as set out</p>	<p><u>BBC agrees with the key parameters and assumptions and welcomes the Outline Employment and Skills Plan that will be developed to address employment, skills, training and supply chain matters relevant to the Project, but BBC would also urge NG to maintain clear communication on how wider community benefit funds will be implemented locally and also provide further detail on the Government's proposed electricity bill discount scheme as this becomes available.</u></p> <p>While the applicant refers to skills development and regional employment opportunities, there is no commitment to deliver measurable outcomes such as apprenticeships, local supply chain</p>	Under-discussion Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>in ID 3.9.3. Regional employment and skills analysis are set out in Paragraph 15.5.8 to 15.5.15 of the 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism, [APP-265]. Notwithstanding this, the Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</p> <p>To elaborate on what the Applicant said in response to Relevant Representations [REP2-023] and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant now proposes to prepare and submit an has engaged with the host authorities and has submitted 8.13 Outline Employment and Skills Plan [Revision A] into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, the Great Grid Partnership, will take to employment, skills, training and supply chain engagement during</p>	<p>engagement, or community investment within Brentwood. The Council also notes the absence of detail on how the Government's proposed electricity bill discount scheme and wider community benefit funds will be implemented locally.</p> <p>While references are made to regional employment and skills development, there is no enforceable strategy to secure local jobs, apprenticeships, or supply chain opportunities for Brentwood businesses. The Council also notes the potential negative impact on the visitor economy, particularly at Thorndon Country Park and other recreational assets, due to prolonged construction activity, visual intrusion, and disruption to public rights of way.</p> <p>BBC requests that the Examining Authority require enforceable commitments for a comprehensive social value strategy, including local employment and training targets, support for community facilities, and transparent delivery of community benefit funds to offset the significant visual and amenity impacts of the scheme.</p> <p>BBC requests that the Examining Authority require the applicant to prepare and implement a Local Economic and Skills Plan, including measurable targets for local employment, training, and procurement, alongside measures to mitigate adverse impacts on tourism and leisure facilities.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>construction of the Project. The Applicant will engage with host authorities to inform the content of the Employment and Skills Plan in advance of its submission into the examination.</p>		
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265] . The baseline conditions and receptors presented are considered appropriate.</p>	<p>BBC supports the ECC position on this issue <u>agrees that the baseline conditions and receptors presented are considered appropriate.</u></p>	<p>Under discussion <u>Agreed</u></p>
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BBC supports the ECC position on this issue <u>agrees that embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p>	<p>Under discussion <u>Agreed</u></p>
3.9.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and</p>	<p>BBC supports the ECC position on this issue <u>agrees that standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p>	<p>Under discussion <u>Agreed</u></p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>Tourism [APP-265] and set out in the 7.2 Outline Code of Construction Practice [REP3-025REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>		
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 15.6 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>BBC supports the ECC position on this issue <u>agrees that additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p>	<p>Under discussion <u>Agreed</u></p>
EIA – Assessment Conclusions				
3.9.10	Construction effects	<p>The assessment of effects during construction is presented in Section 15.7 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. The assessment of effects during construction presented is considered appropriate.</p>	<p>BBC supports the ECC position on this issue <u>agrees that the assessment of effects during construction presented is considered appropriate.</u></p>	<p>Under discussion <u>Agreed</u></p>
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>BBC supports the ECC position on this issue <u>agrees that the assessment of effects during operation and maintenance presented is considered appropriate.</u></p>	<p>Under discussion <u>Agreed</u></p>

Draft DCO / Outline Management Plans / Mitigation and Monitoring

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.9.12	Outline CoCP	The 7.2 Outline CoCP Code of Construction Practice [REP3-025REP4-164] includes all relevant construction related mitigation measures specified in 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. and is appropriate for managing construction impacts from the Project.	BBC supports the ECC position on this issue agrees that OCoCP is appropriate for managing relevant construction impacts from the Project.	Under discussion Agreed

Other matters as required

3.10 Cumulative Effects

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 17.2 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	This matter remains under discussion pending further review by BBC BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Approach and Methods				
3.10.2	Study area	The study area was agreed through 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The BBC agrees with the study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] .	BBC supports the ECC position on this issue <u>agrees that sufficient desktop and survey data has been collected to inform the assessment as presented.</u>	Agreed
3.10.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate. The Applicant is aware of the Brentwood Southern Growth Corridor and the development sites identified (which include Dunton Hills Garden Village). As part of the DCO process, the Applicant has undertaken a cumulative effects assessment (CEA) in accordance with the 6.19 Scoping Report [APP-288 -to APP-296] and 6.20 Scoping Opinion [APP-297] which is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] <u>and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163].</u>	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. BBC Statutory Consultation response: Cumulative Effects are an important issue given the number and scale of developments proposed across Brentwood's 'Southern Growth Corridor', and the need for a full assessment of environmental, socio-economic, transport and construction impacts of the cumulative effects of the Norwich to Tilbury in conjunction with those other projects, which includes the build out of DHGV and the Brentwood Enterprise Park, each with associated supporting infrastructure, in addition to works connected with the Lower Thames Crossing. <u>BBC agrees with the assessment methodology.</u>	Agreed
3.10.5	Key parameters and	Key parameters and assumptions	<u>BBC agrees that key parameters and</u>	Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	assumptions	<p>associated with the Cumulative Effects assessment are summarised in Section 17.4 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The key parameters and assumptions presented are considered appropriate. An assessment of Cumulative Effects undertaken in accordance with the 6.19 Scoping Report [APP-288 -to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] <u>and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]</u>. The assessment includes cumulative effects with the Lower Thames Crossing and Dunton Hills Garden Village (DHGV).</p> <p>All known developments that might impact the Primary Access Routes (PARs) using the local highway network were identified and considered in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]. The DHGV was included within the review of committed developments but was excluded from the assessment given the operational phase would not coincide with the peak year construction activity for the Project. Details on construction programmes and flows were</p>	<p><u>assumptions presented are considered appropriate.</u></p> <p>BBC is concerned about the cumulative impacts arising from the Norwich to Tilbury project being delivered alongside other major developments, notably DHGV and the Lower Thames Crossing (LTC). The co-location and overlapping construction timeframes of these schemes are likely to amplify adverse effects across multiple receptors, including traffic, noise, and community amenity.</p> <p>While the Applicant has indicated engagement with National Highways to address cumulative impacts, no substantive evidence has been provided to demonstrate how these will be effectively mitigated. In particular, there is no information on the phasing of the Norwich to Tilbury project, which is essential to minimise disruption and manage cumulative effects on host communities.</p> <p>The Council also reiterates concerns raised during statutory consultation regarding the wider Brentwood Southern Growth Corridor, which includes DHGV and Brentwood Enterprise Park. These strategic developments, combined with the proposed transmission infrastructure, present significant risks to the local road network and access arrangements. The Council requests that the Applicant explore alternative access options aligned with the phasing of DHGV to reduce harm and maintain safe and efficient operation of the local highway network.</p> <p>BBC considers that the cumulative impacts of</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>not available.</p> <p>Brentwood Enterprise Park is located approximately 6 km from the nearest PAR. Flows from this development are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within our assessments.</p> <p>No significant effects were concluded for traffic and transport, noise or socio-economics with Dunton Hills Garden Village.</p> <p>No significant effects were concluded for traffic and transport, noise or socio-economics with the Lower Thames Crossing.</p>	<p>these projects have not been adequately assessed in accordance with NPS EN-1 and EN-5 and requests that the Examining Authority require the Applicant to provide a robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.</p>	
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The baseline conditions and receptors presented are considered appropriate.</p> <p>National Grid will continue to engage with BBC on this matter.</p>	<p>BBC supports the ECC position on this issue <u>agrees that the baseline conditions and receptors presented are considered appropriate.</u></p>	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to</p>	<p>BBC supports the ECC position on this issue <u>agrees that embedded mitigation is</u></p>	Under discussion ^A

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Cumulative Effects, are set out in Section 17.6 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u>	<u>greed</u>
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in Section 17.6 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and set out in the 7.2 Outline Code of Construction Practice [REP3-025REP4-164] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC supports the ECC position on this issue <u>agrees that standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u>	Under discussion <u>A greed</u>
3.10.9	Additional mitigation	The consideration of additional mitigation measures are <u>is</u> presented in Sections 17.64 and 17.5 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] <u>and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]</u> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC supports the ECC position on this issue <u>agrees that additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</u>	Under discussion <u>A greed</u>
EIA – Assessment Conclusions				
3.10.1	Construction effects	The assessment of effects during	BBC is <u>remains</u> concerned about the cumulative	Under

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
0		<p>construction is presented in Sections 17.4 and 17.57 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]. The assessment of effects during construction presented is considered appropriate.</p> <p>Please see response to ID 3.10.5 for response on DHGV and LTC.</p> <p>An assessment of Cumulative Effects undertaken in accordance with the 6.19 Scoping Report [APP-288 -to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The assessment includes cumulative effects with the Lower Thames Crossing and Dunton Hills Garden Village.</p> <p>All known developments that might impact the Primary Access Routes (PARs) using the local highway network were identified and considered in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]. The DHGV was included within the review of committed developments, but was excluded from the assessment given the operational phase would not coincide with the peak year</p>	<p>impacts arising from the Norwich to Tilbury project being delivered alongside other major developments, notably DHGV and the Lower Thames Crossing (LTC). The co-location and overlapping construction timeframes of these schemes are likely to amplify adverse effects across multiple receptors, including traffic, noise, and community amenity.</p> <p>While the Applicant has indicated engagement with National Highways to address cumulative impacts, no substantive evidence has been provided to demonstrate how these will be effectively mitigated. In particular, there is no information on the phasing of the Norwich to Tilbury project, which is essential to minimise disruption and manage cumulative effects on host communities.</p> <p>The Council also reiterates concerns raised during statutory consultation regarding the wider Brentwood Southern Growth Corridor, which includes DHGV and Brentwood Enterprise Park. These strategic developments, combined with the proposed transmission infrastructure, present significant risks to the local road network and access arrangements. The Council requests that the Applicant explore alternative access options aligned with the phasing of DHGV to reduce harm and maintain safe and efficient operation of the local highway network.</p> <p>BBC considers that the cumulative impacts of construction of these projects have not been adequately assessed in accordance with NPS EN-1 and EN-5 and requests that the Examining</p>	discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>construction activity for the Project. Details on construction programmes and flows were not available.</p> <p>Brentwood Enterprise Park is located approximately 6 km from the nearest PAR. Flows from this development are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within our assessments.</p> <p>No significant effects were concluded for traffic and transport, noise or socio-economics with Dunton Hills Garden Village.</p> <p>No significant effects were concluded for traffic and transport, noise or socio-economics with the Lower Thames Crossing.</p>	<p>Authority require the Applicant to provide a robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.</p>	
3.10.1 1	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.57 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>BBC supports the ECC position on this issue agrees that the assessment of effects during operation and maintenance is considered appropriate.</p>	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.1	Outline CoCP	The 7.2 Outline CoCP Code of	BBC supports the ECC position on this issue.	Under

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
2		<p>Construction Practice [REP3-025][REP4-164] includes all relevant construction related mitigation measures specified in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and is appropriate for managing construction impacts from the Project.</p> <p>MeetingA meeting was held on 9th October to agree on the structure for the 7.2 Outline Code of Construction Practice [REP3-025][REP4-164]. A further meeting was held on 29th January 2025 to address comments from stakeholders.</p>		discussion

Other matters as required

3.11 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]~~[\[REP4-037\]](#).

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.11.1	DCO Requirements – Stages of authorised development	The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is	Schedule 3 Para 3(1) requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning	Not Agreed ^N

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>no requirement for the relevant authority to take any further action or other positive step(s) within that period.</p> <p>However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout 3.1 Draft DCO [REP3-004REP4-037].</p> <p><u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</u></p>	<p>authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. Again, BBC considers that this time frame is too short for the requirements it places on the relevant local authorities and believes that further consideration should therefore be given to how the processes and timescales are set out in this and various parts of the dDCO, and their effect on the ability to fully consider and discharge requirements.</p>	<p style="background-color: red; color: white; text-align: center; padding: 5px;">Not Agreed</p>
<p>3.11.2 <u>4.3.11.2</u></p>	<p>DCO Requirements – Applications made under requirements</p>	<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.</p> <p>The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of</p>	<p>The BBC is of the view that the timeframes set out for discharging requirements must allow sufficient opportunity for the Council to undertake necessary checks, consult stakeholders, and respond appropriately. BBC does not consider that the current dDCO 28-25 business day period from first registration to decision is sufficient for this to be done.</p> <p>This time frame has been justified by NGET's position that "shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address". BBC does not accept this position for reasons set out in the Principle of Development and Alternatives section above, but wishes to put on record that NGET recognises that they are using shorter time limits that can only act <u>are</u> to the detriment of the local authorities along the route.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>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.</p> <p>The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p> <p>Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the 3.1 Draft DCO [REP3-004REP4-037] 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>The Council's concerns on this matter are further heightened by the use in the dDCO of deemed consent after 28 days and/or after approvals being 'unreasonably withheld or delayed', which may be for reasons beyond the Council's controls and with outcomes to the ultimate detriment of its residents.</p>	

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p><u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</u></p>		
<p>3.11.3 <u>23.11.3</u></p>	<p>DCO Requirements – Additional requirements</p>	<p>The Applicant notes the authority's comments regarding the Requirements and awaits further detailed comments.</p> <p>The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State. At present, there are no Requirements proposed to be discharged by the Secretary of State. Each authority should maintain a register of Development Consent Order DCO Requirement discharge applications, as it would planning condition discharge applications and, therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.</p> <p><u>The Applicant has prepared drafting to be included in 3.1 Draft Development Consent Order in relation to post-consent discharge functions, including the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements and will consider whether a Register of Requirements can be incorporated into the next revision of the draft DCO.</u></p>	<p>The<u>BBC is of the view that the</u> draft Requirements require further discussion, particularly in relation to construction hours, piling, and noisy works. Communities must have appropriate periods of respite from intrusive construction activity. For transparency and accountability, the Council strongly encourages<u>acknowledges that NG will now give consideration to</u> the inclusion of a Register of Requirements within the DCO<u>next revision of the dDCO</u>, similar to that adopted for the Lower Thames Crossing, to ensure ongoing fairness and clarity throughout the project's delivery.</p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.11.4	DCO Requirements – Additional requirements	The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by the Applicant to the local planning authorities along the Project route under s.106 of the Town and Country Planning Act 1990, relating to obligations designed to secure at least a 10% biodiversity net gain as part of the Project. As the Applicant intends to secure the BNG commitment via a unilateral undertaking, it is not considered a further commitment within the draft DCO is necessary.	BBC considers that a post-consent programme of ecological mitigation measures and a BNG delivery plan should also be secured through DCO requirements.	Not Agreed

Other matters as required

3.12 Other Matters

Appendix A

Draft DCO Wording

Table A.1 Comments on the draft DCO

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
4-1.	DCO Wording – DCO Structure	<p>The Applicant's position remains that, whilst it has necessarily adapted precedent drafting, the draft Development Consent Order is bespoke to this particular Project and its needs and circumstances.</p> <p>In preparing the 3.1 Draft Development Consent Order [Revision C], recent precedents have been followed and guidance in Advice Note 152 and Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to the 3.1 Draft Development Consent Order [Revision C] on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule.</p> <p>The structure and content of the 3.1 Draft Development Consent Order [Revision C] is referenced extensively through the application documents and any material change to the structure of the document in particular would require the updating of a very significant amount of the application</p>	<p>BBC acknowledges that the dDCO broadly follows the structure of previously approved DCO's but considers that given the scale and complexity of this Project, it is essential that the Order reflects local requirements and does not simply replicate precedent where this would compromise effective implementation.</p> <p>BBC also notes several areas of the dDCO that require clarification and possibly amendment. (Para 9.1)</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		documentation and cannot be supported on that basis given the scale of the application that has to be examined in the Examination period.		
2-2.	DCO Wording – Timescales <u>Definition of Maintain</u>	<p><u>The Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, “provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement”, is included in the definition of “maintain”.</u></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</p>	<p><u>BBC understands that the definition of “maintain” includes a wide range of specified operations in relation to the authorised development which can be undertaken subject to those works not giving rise to any materially new or materially different environmental effects to those identified in the Environmental Statement. The Applicant refers to precedent and that it is not necessary or appropriate for there to be any external oversight of what is new or materially different. The Applicant also refers to its statutory duty to maintain a safe and efficient transmission network. However, BBC considers this has little bearing on whether those works covered by the definition of maintain have any new or additional environment effects. BBC acknowledges that certain works including inspect, repair, dismantle, remove, clear, refurbish, paint, surface treat, and decommission are unlikely to give rise to new or materially different environmental effects. However, works involving alteration, improvement, reconstruction or replace, which are also covered by the current definition, do retain the potential to give rise to new or materially different environmental effects.</u></p> <p>First, the time frames set out in dDCO Schedule 4 Para 1 for discharging requirements must allow sufficient opportunity for the Council to undertake</p>	Under discussion

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		<p>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>The use of "business days" rather than "calendar days" across the draft Development Consent Order is consistent with made development consent orders but the Applicant has considered the point and made appropriate amendments in 3.1 Draft Development Consent Order [Revision C] submitted at Deadline 3 (with the exception of the timings set out in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders). The Applicant's position is that</p>	<p>necessary checks, consult relevant stakeholders, and respond appropriately. BBC does not consider that the current dDCO 28-day period from first registration to decision is sufficient for this to be done.</p> <p>This time frame has been justified by NGET's position that "shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address". BBC does not accept this position for reasons set out in the Principle of Development and Alternatives section above, but wishes to put on record that NGET recognises that they are using shorter time limits that can only act to the detriment of the local authorities along the route.</p> <p>The Council's concerns on this matter are further heightened by the use in the dDCO of deemed consent after 28 days and/or after approvals being 'unreasonably withheld or delayed', which may be for reasons beyond the Council's controls and with outcomes to the ultimate detriment of its residents.</p> <p>Similar to the above, Schedule 3 Para 3(1) requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. Again, BBC considers that this time frame is too short for the requirements it places on the relevant local authorities and believes that</p>	

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		<p><u>the assessment as to whether maintenance activities result 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 that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008.</u></p>	<p>further consideration should therefore be given to how the processes and timescales are set out in this and various parts of the dDCO, and their effect on the ability to fully consider and discharge requirements.</p> <p>Secondly, in relation to dDCO Part 3, Part 6- Section 49, as well as Schedule 2 Part 1, Schedule 2 Part 6, Schedules 5-9 and Schedule- 13, ECC has raised detailed concerns regarding protective provisions in its capacity as highway authority for the borough, and BBC supports this need for robust measures to ensure the integrity of the local highway network, particularly in the context of the cumulative impacts as set out in the relevant section above.</p> <p><u>(Para 9.2-9.6)If these operations are to remain within the definition of 'maintain', BBC is of the view that to provide clarity and avoid any dispute, the DCO should incorporate a mechanism for determining whether such maintenance works give rise to materially new/different environmental effects. BBC therefore considers that the definition of 'maintain' should be amended to include: "provided such works do not, in the opinion of the local planning authority, give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of 'maintain' must be construed accordingly."</u></p>	
3.	<u>DCO Wording - Definition of "relevant planning</u>	<u>Where local government reorganisation results in more than one successor authority across a current given area — as may well</u>	<u>BBC acknowledges that in light of previous host authority responses, the Applicant has reframed the definition of 'relevant planning authority'.</u>	<u>Under discussion</u>

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	<u>authority</u> "	<p>occur across Essex — the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is already optimally structured from a statutory drafting perspective to address the scenario Brentwood describes. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case. The addition of "or successors" (plural) is unnecessary: the reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the</p>	<p>However, the substantial majority of post-consent discharge activity on the Project will occur after April 2028, by which point the two-tier structure across Essex will have ceased to exist. BBC considers that the Applicant's reframing does not fully capture that transition.</p>	

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		<p><u>definition already achieves and is therefore unnecessary.</u></p> <p><u>There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.</u></p>		
3.4.	DCO Wording – <u>Order limits</u>	<p>The Applicant considers the scope of the authorised development and limits of deviation to be sufficiently clear.</p> <p>The authorised development and associated development are described in Schedule 1 to the 3.1 Draft Development Consent Order [Revision C]. The authorised development is further shown on the 2.3 Works Plans [APP-017 – APP-024]. In addition, the Applicant submitted a 5.14 Details of Associated Development, with references to documents [APP-121] report with its application, which delineates the authorised development and the associated development. The Limits of Deviation are set</p>	<p>BBC also maintains its position that further clarity is needed on the scope of authorised development and the limits of deviation, so that the consent granted accurately reflects the development examined.</p>	Under discussion

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		<p>out in Article 5 (limits of deviation) to the 3.1 Draft Development Consent Order [Revision C] and are shown on the 2.3 Works Plans [APP-017 – APP-024] and in the table of parameters at the back of the Works Plans for each section.</p>		
<p>4.<u>5.</u></p>	<p>DCO Wording – Disapplication of Hedgerows Regulations 1997</p>	<p>Hedgerow surveys in line with the Hedgerows Regulations 1997 have been undertaken across the route. Details of these hedgerow surveys have been presented within 6.8 Environmental Statement Chapter 8 Ecology and Biodiversity [AS-026] and 6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]. All native species hedgerows are considered to be Habitats of Principal importance and are to be safeguarded. Impacts to hedgerows have been minimised as far as possible. Measures to safeguard hedgerows are presented within 7.4 Outline Landscape and Ecological Management Plan [AS-046] and therefore the Applicant is satisfied that there will be sufficient protections in place for hedgerows, even with the disapplication of the Hedgerow Regulations 1997.</p> <p>The Applicant has committed to monitoring/managing all tree, hedgerow and aquatic planting on-site for five years. Long-term management, monitoring and reporting of the Environmental Areas will be undertaken for a minimum of 30 years.</p>	<p>The CouncilBBC is concerned about the proposed disapplication of the Hedgerows Regulations 1997 under Article 50. Before this can be agreed, the Applicant must provide a proper assessment of the impact on protected hedgerows and demonstrate how these will be safeguarded.</p>	<p>Under discussion</p>

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		Further information can be found in 3.12 of 8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A) [REP2-030] .		
5-6.	DCO Wording – Protective Provisions	<p>The Applicant notes that Essex County Council has raised comments on the protective provisions and the Applicant has responded to these directly.</p> <p><u>The Applicant is continuing to engage with the relevant highway authorities on protective provisions and a framework highways agreement, the latter of which the Applicant understands to be the highway authorities' preference.</u></p>	<p><u>In relation to dDCO Part 3, Part 6 Section 49, as well as Schedule 2 Part 1, Schedule 2 Part 6, Schedules 5-9 and Schedule 13, ECC has raised detailed concerns regarding protective provisions in its capacity as highway authority for the borough, and BBC supports this need for robust measures to ensure the integrity of the local highway network, particularly in the context of the cumulative impacts as set out in the relevant section above.</u></p> <p><u>(Para 9.2-9.6)</u></p> <p>As highway authority for the borough, Essex County Council has raised detailed concerns regarding protective provisions, and Brentwood supports the need for robust measures to ensure the integrity of the local highway network.</p>	Under discussion
6-7.	DCO Wording – <u>Register of Requirements</u>	<p>The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State. At present, there are no Requirements proposed to be discharged by the Secretary of State. Each Authority should maintain a register of DCO Requirement discharge applications, as it would planning condition</p>	<p>Similar to that adopted for the Lower Thames Crossing, BBC also strongly encourages the inclusion of a Register of Requirements within the DCO for the purposes of transparency and accountability and to ensure ongoing fairness and clarity throughout the Project's delivery.</p>	Under discussion

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		<p>discharge applications and, therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.</p> <p><u>The Applicant has prepared drafting to be included in 3.1 Draft Development Consent Order in relation to post-consent discharge functions, including the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements and will consider whether a Register of Requirements can be incorporated into the next revision of the draft DCO.</u></p>		

4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Brentwood Borough Council:

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Date:

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Abbreviations

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

Abbreviation	Full Reference
WFD	Water Framework Directive
WHIASU	Wales Health Impact Assessment Support Unit
WIIA	Waste Infrastructure Impact Assessment
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

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Modified filename: 5.9.11 Draft Statement of Common Ground - Brentwood Borough Council Revision D - BBC Checked.docx	
Changes:	
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Delete	358
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	14
Table Delete	8
<u>Table moves to</u>	0
Table moves from	0
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Embedded Excel	0
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