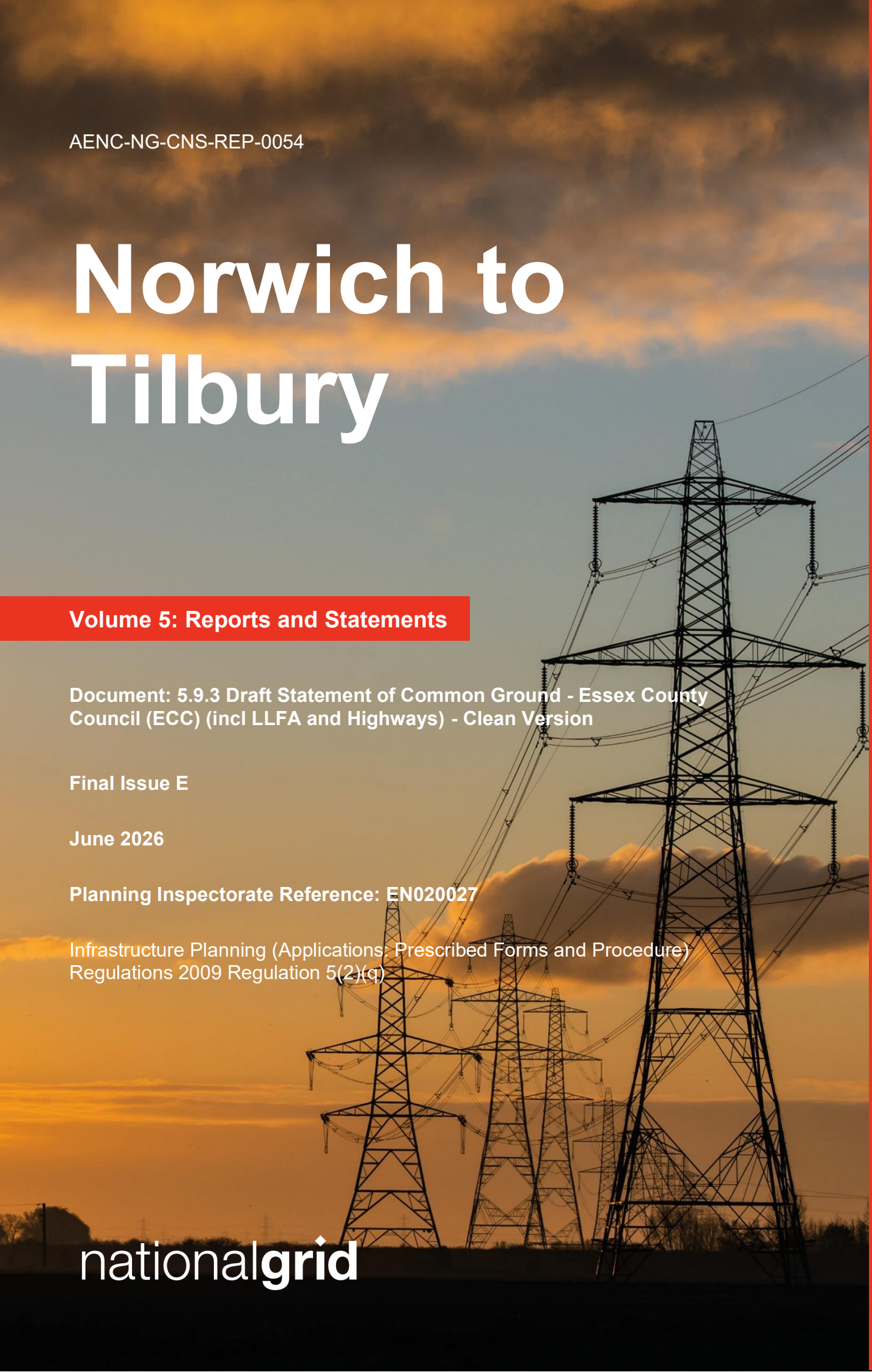
AENC-NG-CNS-REP-0054

Norwich to Tilbury



Volume 5: Reports and Statements

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

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nationalgrid

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Contents

1.	**Introduction**	**1**
1.1	Overview	1
1.2	Summary of matters Under Discussion	1
1.3	Project Description	19
1.4	Format and Structure of this Document	20
2.	**Record of Key Engagement**	**21**
2.1	Introduction	21
2.2	Summary of Key Engagement	21
3.	**Matters Agreed, Not Agreed or Under Discussion**	**41**
3.1	Overview	41
3.2	Project development, description and design	42
3.3	Ecology and Biodiversity	58
3.4	Green Infrastructure	73
3.5	Contaminated Land, Geology and Hydrogeology	82
3.6	Health and Wellbeing	83
3.7	Historic Environment	101
3.8	Hydrology, Land Drainage and Flood Risk	117
3.9	Landscape and Visual	128
3.10	Socio-economics, Recreation and Tourism	139
3.11	Traffic and Transport	155
3.12	Public Rights of Way (PRoW)	233
3.13	Cumulative Effects	236
3.14	Development Consent Order	244
3.15	Other Matters	261
4.	**Appendices**	**265**
4.1	Appendix A Draft DCO wording	265
5.	**Confirmation of Agreement**	**298**

Table 2.1	Summary of Key Engagement between National Grid and Essex County Council	21
Table 3.1	Agreement status for matters presented in Section 3	41
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters	42
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	58
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Green Infrastructure	73

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology 82
Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing 83
Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment 101
Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk 117
Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual 128
Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism 139
Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport 155
Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way 233
Table 3.13 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects 236
Table 3.14 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order 244
Table 3.15 Matters Agreed, Not Agreed or Under Discussion in relation to Other Matters 261
Table A.1 Essex County Council – Comments on the draft DCO 265

Abbreviations 299

1. Introduction

1.1 Overview

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

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

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

1.2 Summary of matters Under Discussion

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

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
Project development, description and design		
3.2.5 – Policy compliance	ECC sought legal advice to confirm there is presumption in favour of approving a NPS compliant scheme unless one of a range of specified exceptions applies. Norwich to Tilbury has been developed in line with National Planning Policy (EN-1, EN-3, EN-5). This position is provided in Section 4.2 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	Resolution likely by Deadline 7.
3.2.6 – Dunton Hills Garden Village (DHGV) 3.15.1 – Dunton Hills Garden Village Viability	ECC maintain the proposal would degrade the principles of a Garden Village and is likely to lead to a reduction in property prices, which would be to the detriment of the viability and deliverability of housing and infrastructure delivery. The Applicant has taken into account the potential effect of its proposals when developing the alignment and works within the context of the planning status of other projects including DHGV. The Applicant's position is that deliverability of DHGV is not prejudiced by the Project. Further detail on this position is provided in Section 3.8 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	All matters unlikely to be agreed.
3.2.7 – Design principles	ECC feels there is an opportunity to be innovative in the approach to design and suggested the Applicant must follow a good design process to ensure that infrastructure remains functional and safe while considering best local design and environmental outcomes, especially around the EACN and would wish to see commitments around the issue of design informing the draft DCO / Schedule of Requirements. The primary design requirement for electricity infrastructure is that it must be safe and sure, acknowledging functional constraints. While the overall design is largely fixed, smaller design details, such as the colour of finishes, are agreed upon and documents through the DCO process. This position is provided in Section 3.9 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	Resolution likely by Deadline 7.
3.2.8 – 3.2.11 - Consultation	ECC acknowledges that the 2022, 2023 and 2024 consultations were undertaken in accordance with the Consultation Strategy and Statement of Community Consultation (SoCC), though query the targeted consultation process completed in 2025.	This matter is unlikely to be agreed

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	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 ReportAPP-066]**	
3.2.12 -Community Benefits	ECC strongly encourage NGET to positively respond to the issue of social value and community benefits. In particular, ECC believe significant benefits should be realised from N2T for education, skills, and employment during construction and operation. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	Matter is unlikely to be agreed as it would be delivered outside the development consent process
3.15.4 – Removal of obsolete pylons	ECC welcomes the proposal to remove a number of 132 kV pylon lines and would encourage the Applicant to explore opportunities to reduce cumulative visual impact of energy infrastructure The Applicant requests ECC provides specific 132 kV lines for removal, with justification, for consideration.	Resolution likely by Deadline 7.
3.15.5 – Airfields	ECC reserves its position on airfields regarding confirmation of the impact on future use of airfields across the county. The Applicant's position on airfield safety and security is provided Section 3.17 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	Resolution likely by Deadline 7.
Ecology and Biodiversity		
3.3.6 – Key parameters and assumptions	ECC recommends replacement planting failure percentage should be factored into the compensation requirement. ECC considers the proposed period of aftercare and management is insufficient and leaves open a credible possibility of a high failure rate detrimental to the quality of replacement planting. The Applicant confirms a commitment to a 5-year aftercare period for all replacement tree and hedgerow planting and a 30-year aftercare period at Environmental Areas. ECC is	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	reviewing sections relating to habitat reinstatement and will provide the Applicant with an update once complete.	
3.3.11 – Construction effects 3.3.18 – Data sources (bats) 3.3.19 – Survey methodology (bats) 3.3.20 – Baseline conditions and receptors (bats) 3.3.21 – Standard mitigation (bats)	ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation. ECC requests further information regarding the baseline conditions and receptors and standard mitigation for roosting bats and securing an agreed level of bat roost tree resource compensation. The Applicant has provided further clarification on the bat survey scope and notes Natural England's agreement with the bat roost survey scope.	Resolution likely by Deadline 7.
3.3.13 – Outline CoCP	ECC remains unconvinced that the **7.2 Outline Code of Construction PracticeREP4-164]** provides adequate guarantees of ECoW competence or capacity. The Applicant maintains that this role will not be undertaken by one individual, but by multiple ecologists with a range of relevant experience and any protected species licences necessary for the specific task to be undertaken. Further details on the number and type of ECoWs required across the Project will be included within the Final Landscape and Ecological Management Plan (post-DCO consent).	Matter unlikely to be agreed during Examination.
3.3.14 – Outline LEMP	The Applicant has provided further clarification regarding the criteria used for defining a tree's bat hibernation potential and notes that all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed. ECC hopes this this can be addressed under the discussion concerning the compensation offering for the overall bat roost tree resource impact of the project.	Resolution likely by Deadline 7.
3.3.15 – Biodiversity Net Gain – onsite and assessment	ECC would like this matter to remain Under Discussion until the matter relating to replacement tree and hedgerow planting is resolved.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.3.16 – Biodiversity Net Gain - offsite	ECC is seeking further clarification regarding offsite BNG. The Applicant notes that this will be secured by legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.	Resolution likely by Deadline 7.
3.3.17 – Arboriculture Impact Assessment	ECC is reviewing sections relating to the Arboriculture Impact Assessment and will provide the Applicant with an update once complete. Agreement to proposed mitigation is required.	Resolution likely by Deadline 7.
Green Infrastructure		
3.4.1 - Data sources (ecology matters)	ECC maintain that The Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study. The Applicant maintains that sufficient data informs the assessment and will consider the Recovery Strategy as part of the off-site BNG selection process.	Resolution likely by Deadline 7.
3.4.2 - Standard mitigation 3.4.3 - Additional mitigation	ECC requests GI principles are integrated into the mitigation hierarchy. ECC state that GI delivery should be explicitly aligned with the Essex GI Strategy. The Applicant confirms the commitment to achieving wider strategic outcomes at the local level through BNG commitments. ECC is awaiting further details around the procurement process for BNG.	Resolution likely by Deadline 7.
3.4.4 - Outline LEMP	ECC requests clarity on long-term monitoring for BNG delivery. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas. Detail on habitat management and monitoring will be set out in the final Landscape and Ecological Management Plan post consent. ECC seeks clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery.	Resolution likely by Deadline 7.
3.4.5 - Biodiversity Net Gain 3.4.8 - Outline LEMP (landscape and visual)	ECC recommend that more than 10% BNG is delivered, and to ensure delivery is in line with the Essex LNRS. Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions. ECC is concerned about double-counting between mitigation, enhancement, and compensation. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites. ECC seeks clarity	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery.	
3.4.6 - Embedded mitigation (landscape and visual)	ECC requests GI is used as a component of landscape mitigation and is aligned with LNRS strategies. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances.	Resolution likely by Deadline 7.
3.4.7 - Additional mitigation (landscape and visual)	Discussion ongoing regarding compensation measures and offsite BNG provision. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.	Matter unlikely to be agreed during Examination, as this is a post-consent matter.
Contaminated Land, Geology and Hydrogeology		
3.5.3 – Operational (and maintenance) effects	Further discussion is required regarding safeguarding of mineral deposits and the MWPA's call for sites for the emerging Essex Minerals Local Plan	Resolution likely by Deadline 7.
Health and Wellbeing		
3.6.5 – Key parameters and assumptions	ECC recommends the health assessment is updated to consider the October 2025 IMD data and address changes to vulnerable and sensitive receptors. The Applicants confirms that following a review of the updated IMD data published in October 2025, it is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment. ECC is reviewing this.	Resolution likely by Deadline 7.
3.6.7 – Embedded mitigation 3.6.8 – Standard mitigation 3.6.9 – Additional mitigation	ECC recommends that consideration is given to the mitigation proposed, including the exploration of establishing of a Health and Wellbeing Monitoring Framework and a Communication Strategy The Applicant confirms that they will continue to engage with people potentially affected during the lifecycle of the Project.	Resolution likely by Deadline 7.
Historic Environment		
3.7.14b – Standard mitigation (built heritage)	ECC recommend expansion of commitment H07 in the **7.2 Outline Code of Construction PracticeREP4-164]**. ECC is concerned that the **7.2 Outline Code**	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	of Construction PracticeRE4-164] does not include mitigation proposals for impacts to built heritage during the construction phase.	
3.7.16 – Additional mitigation 3.7.25 – Outline Archaeological Mitigation Strategy and Outline WSI	ECC note that the effectiveness of additional mitigation will depend on **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]**. The Applicant is currently preparing an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** scheduled for submission at Deadline 5.	Resolution likely by Deadline 7.
Hydrology, Land Drainage and Flood Risk		
3.8.1 – Policy and legislation 3.8.8 – Standard mitigation 3.8.9 – Additional mitigation	ECC request further information on proposals for surface water management and storage calculations. The Applicant confirms that further information on this regard has been submitted as part of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. ECC is reviewing the **8.2 Drainage StrategyREP4-186] and will** provide the Applicant with an update once complete at Deadline 5.	Resolution likely by Deadline 7.
3.8.3 – Data sources 3.8.5 – Key parameters and assumptions 3.8.6 – Baseline conditions and receptors 3.8.7 – Embedded mitigation 3.8.11 – Operational (and maintenance) effects 3.8.13 – Flood Risk Assessment	ECC is concerned about flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation. The Applicant confirms that commitment W08 within **7.2 Outline Code of Construction PracticeREP4-164]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs.	Resolution likely by Deadline 7.
3.8.10 – Construction effects 3.8.12 – Outline CoCP (including Flood Warning and Evacuation Plan)	ECC refer to their comments in the Relevant Representations that surface water runoff from permanent and temporary built-up areas should be managed on site. The Applicant confirms that further detail on this regard has been submitted as part of **8.2 Drainage StrategyREP4-186] at Deadli**ne 4.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
Landscape and Visual		
3.9.7 – Embedded mitigation	ECC is concerned around the adequacy of undergrounding, mitigation and lack of compensation. The Applicant reiterates that the embedded mitigation proposed is considered appropriate.	Matter is unlikely to be agreed during Examination.
3.9.8 – Standard mitigation 3.9.9 – Additional mitigation	ECC is concerned that standard mitigation proposed does not address residual landscape effects or compensation. The Applicant reiterates that the standard mitigation proposed is considered appropriate.	Matter is unlikely to be agreed during Examination.
3.9.10 – Construction effects	ECC is concerned that the potential tree and hedgerow loss has not been meaningfully quantified in relation to landscape and visual. The Applicant refers to the vegetation loss assessment is set out in **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section AREP4-029].**	Resolution likely by Deadline 7.
3.9.11 – Operational (and maintenance) effects	ECC request the consideration of further re-routing and undergrounding to reduce significant landscape and visual effects. The Applicant confirms that the approach to the LVIA follows professional guidance and was discussed with stakeholders. It is considered that the judgements made as part of the assessments remain fair and reasonable.	Matter is unlikely to be agreed during Examination.
3.9.12 – Outline CoCP	ECC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete.	Resolution likely by Deadline 7.
3.9.13 – Outline LEMP	ECC retain concerns in relation to definition, scope and scale of term ‘compensation’. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations. The Applicant maintains that all relevant measures are appropriate.	Matter is unlikely to be agreed during Examination.
3.9.14 – Cumulative effects	ECC is concerned regarding cumulative adverse landscape and visual effects at construction and operational phases. The Applicant confirms that the cumulative assessment will be updated and published at Deadline 4 to include Five Estuaries, North Falls, the Tarchon Interconnector Project and any other newly identified schemes in the area around Ardleigh and along the rest of the Project.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
Socio-economics, Recreation and Tourism		
3.10.3 – Data sources	ECC has reviewed the Employment and Skills Strategy and requests detailed labour market demand data and targeted upskilling and provides detailed commentary within this SoCG. Amendments and clarifications will be required to resolve this issue. The Applicant has submitted an Employment and Skills Plan into the Examination at Deadline 5. The Applicant also confirms continued engagement to deliver long-lasting community benefits.	Resolution likely by Deadline 7.
3.10.4 – Assessment methodology	ECC request that businesses outside of the study area that will be impacted to be considered on a case-by-case basis. The Applicant maintains that businesses where visual impact would be likely to be an economic consideration, that beyond the 3km study area were not considered likely to have significant adverse effects.	Resolution likely by Deadline 7.
3.10.7 – Embedded mitigation 3.10.8 – Standard mitigation	ECC requests that skills and community benefits should be considered separately. The Applicant has submitted an Employment and Skills Plan at Deadline 5.	Resolution likely at Deadline 6.
Traffic and Transport		
3.11.3 – Data sources	Additional traffic data, modelling, traffic flows and technical note to be provided for ECC to review.	Resolution likely by Deadline 6.
3.11.5 - Key parameters and assumptions	ECC review of traffic assumptions (such as workers arrival/departure times, car occupancy rates) to continue until monitoring, management and mitigation is agreed	Resolution likely by Deadline 6.
3.11.6 - Key parameters and assumptions	ECC queried impacts on local roads due to road crossings.	Resolution likely by Deadline 6.
3.11.7 - Key parameters and assumptions	ECC queried HGV arrival/departure times on sensitive routes, such as specific highway junctions/links or routes near schools. The Applicant has outlined the expected Project construction traffic at these locations.	Resolution likely by Deadline 6.
3.11.8 - Key parameters and assumptions	ECC have sought further discussion on collision clusters. The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.9 - Key parameters and assumptions	ECC queried assessment of parking impacts. The Applicant has outlined the case-by-case assessment of parking impacts and will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.10 - Key parameters and assumptions	ECC queried identification of sensitive receptors near schools. The Applicant has considered impacts adjacent to schools, considers the proposed mitigation appropriate, and will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.11 - Key parameters and assumptions	ECC queried assessment criteria and use of IEMA guidelines. The Applicant confirms its use of IEMA guidelines in its assessments and will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.12 - Key parameters and assumptions	ECC has accepted the figures in the trip generation, subject to the numbers being monitored and managed with mitigation. The Applicant is continuing engagement with ECC to agree the monitoring, management and mitigation measures.	Resolution likely by Deadline 6.
3.11.13 - Baseline conditions and receptors	Further discussions are ongoing with ECC regarding school activity, personal injury clusters, PRoW and pedestrian routes on narrow footways on PARs, as well as pinch points/traffic calming.	Resolution likely by Deadline 6.
3.11.15 - Embedded mitigation	The Applicant will continue to liaise with ECC on construction worker travel.	Resolution likely by Deadline 6.
3.11.16 - Embedded mitigation	The Applicant is engaging with ECC on the subject of emergency callouts that could reasonably be attributed to the Project.	Resolution likely by Deadline 6.
3.11.17 - Embedded mitigation	ECC requested further detail on shift patterns, working hours, and how these will be managed. The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.18 - Embedded mitigation	ECC has sought commitment to reducing freight by road. The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.19 - Embedded mitigation	The monitoring, management and mitigation of construction vehicles numbers is Under Discussion between ECC and the Applicant.	Resolution likely by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.20 - Embedded mitigation	ECC has sought wider commitment to engaging with the public. The Applicant will continue to discuss this with ECC.	Resolution likely by Deadline 6.
3.11.21 – Standard mitigation	The Applicant will continue to liaise with ECC in relation to standard mitigation(s).	Resolution likely by Deadline 6.
3.11.22 - Additional mitigation	The Applicant will continue to liaise with ECC in relation to PRoWs that link onto, or cross PARs, narrow footways on PARs, road safety issues on PARs, crossing facilities and pinch points.	Resolution likely by Deadline 6.
3.11.23 - Additional mitigation 3.11.24 - Additional mitigation	The Applicant will continue to liaise with ECC in relation to additional mitigation at junctions and construction traffic restrictions proposed in the vicinity of schools.	Resolution likely by Deadline 6.
3.11.25 and 3.11.26 - Construction effects - WCH	The Applicant will continue to liaise with ECC in relation to construction effects on all PRoW users along the construction route and on schools.	Resolution likely by Deadline 6.
3.11.27 - Construction effects – Spa Road	The Applicant will continue to liaise with ECC in relation to the evaluation of construction effects and accommodating HGV movements on Spa Road, Witham.	Resolution likely by Deadline 6.
3.11.29 - Construction effects - PRoW	The Applicant will continue to liaise with ECC on potential PRoW mitigation at certain locations.	Resolution likely by Deadline 7.
3.11.30 - Construction effects – bus passenger delay	The Applicant will continue to liaise with ECC in relation to construction effects on bus passenger delay (including school buses).	Resolution likely by Deadline 7.
3.11.31a – EIA - Construction effects – fear and intimidation	The Applicant will continue to liaise with ECC in relation to fear and intimidation on PARs.	Resolution likely by Deadline 7
3.11.31b – EIA - Construction effects - impacts outside of peak activity	The Applicant will continue to liaise with ECC in relation to construction impacts outside of peak activity.	Resolution likely by Deadline 7
3.11.32 - Outline CoCP	The Applicant will continue to liaise with ECC on this matter which ECC have related to embedded, standard and additional mitigation measures for Socio-economic, Recreation and Tourism effects.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.37 - Assessment of WCH	The Applicant will continue to liaise with ECC in relation to construction effects on all PRoW users along the construction route (for the Assessment of WCH).	Resolution likely by Deadline 7.
3.11.38 - Impact on Parking	ECC and the Applicant will continue to liaise in relation to parking impacts, and street parking restriction.	Resolution likely by Deadline 7.
3.11.39 - Existing road side facilities (parking)	The Applicant will continue to liaise with ECC in relation to detail on the parking provision for construction worker vehicles (including monitoring and management).	Resolution likely by Deadline 7.
3.11.41 - Impact on Parking	The Applicant will continue to liaise with ECC in relation to the impact on existing HGV driver facilities and measures.	Resolution likely by Deadline 6.
3.11.42 - Road Safety	ECC and the Applicant will maintain ongoing discussions in relation to road safety improvements along the PARs.	Resolution likely by Deadline 7.
3.11.44a to 3.11.44g – Transport Assessment - Mitigation Measures	The Applicant will continue to liaise with ECC on these matters.	Resolution likely by Deadline 7.
3.11.45 - Baseline conditions 3.11.46 - Baseline conditions	The Applicant will continue to liaise with ECC in relation to baseline conditions and sensitive receptors, and existing HGV driver facilities.	Resolution likely by Deadline 7.
3.11.48 - Cumulative Developments	Review of committed developments (including the list of committed developments provided by ECC to the Applicant). The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 6.
3.11.49 - Key Assumptions	The Applicant will continue to liaise with ECC in relation to key assumptions within the TA on this matter	Resolution likely by Deadline 7.
3.11.50 – Methodology 3.11.51 – Construction Vehicle Trips 3.11.52 – Construction Workforce Trips	The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with respect to the methodology of the Trip Generation).	Resolution likely by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.53 - Overall impact of the project	The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with respect to the conclusion of the Transport Assessment).	Resolution likely by Deadline 6.
3.11.55 - Pre-and Post Construction Surveys	The Applicant will continue to liaise with ECC in relation to pre-and post-construction surveys and maintenance liability for local highway network.	Resolution likely by Deadline 6.
3.11.57 - Traffic Management Measures	The Applicant will continue to liaise with ECC in relation to the commitment to hold discussions with bus operators that are affected (particularly school buses) by routes that are diverted (regardless of duration) to minimise impacts.	Resolution likely by Deadline 7.
3.11.58 - Implementation/ Enforcement	The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with to the implementation and enforcement process set out in CTMP).	Resolution likely by Deadline 6.
3.11.59 – Implementation/Enforcement	The Applicant will continue to liaise with ECC in relation to requested clarification on the communication strategy to the wider public (with respect to AIL movements) and engagement with the Developers Forum.	Resolution likely by Deadline 6.
3.11.60 - Policy	The Applicant will continue to liaise with ECC in relation to inclusion of baseline figures (as part of the targets set out in the CWTP).	Resolution likely by Deadline 7.
3.11.62 - Targets, Strategy, and Measures	ECC has requested a commitment to the provision of mini buses. The Applicant will continue to discuss this with Main Works Contractor(s) and ECC once more details are known about the location of construction staff at the next stage of design.	Resolution likely by Deadline 7.
3.11.63 - Targets, Strategy, and Measures	ECC has requested The Applicant provides clarification on parking provision and management and interventions proposed by the Applicant in the CTMP. The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 7.
3.11.64 – Targets, Strategy and Measures	The Application will continue to liaise with ECC in relation to the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the final CWTP).	Resolution likely by Deadline 7.
3.11.65 - Monitoring and Review	The Applicant will continue to liaise with ECC in relation to the Monitoring and Review process described in the CWTP.	Resolution likely by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.67 - Primary Access Route Selection	The Applicant will continue to liaise with ECC in relation to highway mitigation proposals (on PARs).	Resolution likely by Deadline 7.
3.11.68 - Construction Access and Crossover Design	The Applicant will continue to liaise with ECC in relation to proposed site access and crossover points.	Resolution likely by Deadline 7.
3.11.69 - Highway Mitigation Design	The Applicant will continue to liaise with ECC in relation to highway mitigation proposals. ECC to respond after review of Designer's Response to be submitted by the Applicant (including works outside of the Public Highway, categorised as 'Red' in the CTMP).	Resolution likely by Deadline 7.
3.11.72 to 3.11.76 – Traffic Regulation Orders and Temporary Traffic Regulation Orders	The Applicant will continue to liaise with ECC in relation to ECC's general request for more information on the TROs.	Resolution likely by Deadline 7.
3.11.77 - Traffic Regulation Orders and Temporary Traffic Regulation Orders	ECC seeking confirmation of checks done on diversion routes for proposed TROs(structural, width, height and environmental restrictions). The Applicant will continue to liaise with ECC on this matter.	Resolution likely by Deadline 7.
3.11.78 and 3.11.79 - Traffic Regulation Orders and Temporary Traffic Regulation Orders	ECC request for further reviews of road closure diversion routes in advance of road closures and a mechanism for any scope changes to diversion routes. The Applicant will continue to liaise with ECC on these matters.	Resolution likely by Deadline 7.
3.11.84 - Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road	The Applicant will continue to liaise with ECC in relation to ECC concerns on the highway mitigation proposal for Ardleigh Road / Bentley Road.	Resolution likely by Deadline 7.
3.11.86 - Abnormal Indivisible Load (AIL) Access Routes	The Applicant will continue to liaise with ECC in relation to structural investigations for AIL movements and AIL tracking drawings.	Resolution likely by Deadline 7.
3.11.88 - Abnormal Indivisible Load (AIL) Structural Investigations	The Applicant will continue to liaise with ECC in relation to structural assessments along the selected AIL routes that are to be completed by the Contractor.	Resolution likely by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.89 and 3.11.90 - Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant will continue to liaise with ECC in relation to road safety audits that involve proposed AIL movements and if a Road Safety Audit at Beaulieu Parkway Roundabout is suitable.	Resolution likely by Deadline 7.
3.11.91 - Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant will continue to liaise with ECC in relation to providing clarification of the communication strategy for AIL movements, including for informing the wider public.	Resolution likely by Deadline 6.
3.11.93 – Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant will continue to liaise with ECC in relation to potential cost recovery through a Planning Performance Agreement (PPA)	Resolution likely by Deadline 7
Public Rights of Way (PRoW)		
3.12.3 - Proposed Management Regime Approach	The Applicant will continue to liaise with ECC in relation to PRoW should they be identified to be permanently stopped-up, and consult with ECC to agree the appropriate mitigation. ECC has raised considerable commentary on the PRoW Management Plan which requires consideration by the Applicant.	Resolution likely by Deadline 7.
3.12.5 – Proposed Management Regime Approach (vegetation clearance)	The Applicant will continue to liaise with ECC in relation to vegetation clearance of existing footways and maintenance of verges.	Resolution likely by Deadline 7
Cumulative Effects		
3.13.1 – Policy and Legislation	ECC requests a Developer's Forum with key members of NSIPs, including North Falls, Five Estuaries and Lower Thames Crossing, and further detail on construction programme for this engagement. The Applicant confirms that the NSIPs mentioned have been considered as part of the cumulative effects assessment, and engagement is ongoing with these project teams.	Resolution likely by Deadline 7
3.13.7 – Embedded mitigation 3.13.8 – Standard mitigation	ECC requests further discussions to ensure mitigation is agreed and secured appropriately. The Applicant considers that all mitigation is appropriate and will be secured through the DCO.	Resolution likely by Deadline 7

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.13.9 – Additional mitigation		
3.13.10 – Construction effects 3.13.11 – Operational (and maintenance) effects	ECC is concerned about the cumulative noise impacts, and adverse effects on communities and the environment, with consideration for the proposed construction working hours. ECC is also concerned that the Project would lead to significant landscape change across Essex. ECC also sets out its concerns in relation to construction traffic.	Matter unlikely to be agreed during Examination.
3.13.12 – Outline CoCP	ECC is reviewing the updated **7.2 Outline Code of Construction Practice REP4-164]** and will provide the Applicant with an update once complete.	Resolution likely by Deadline 7
3.13.13 – Cumulative impacts	ECC is concerned over the cumulative effects of NSIPs proposed, and the Tarchon Interconnector. The Applicant confirms that Tarchon Interconnector is being considered in the updated cumulative effects assessment, which will be submitted during examination.	Resolution likely by Deadline 7
Development Consent Order		
3.14.1 – Interpretation	ECC would like the definition of reinstatement planting to distinguish between replacement planting and what constitutes mitigation and compensation planting. The Applicant does not agree.	This matter is unlikely to be resolved.
3.14.3 – Construction environmental management plans	ECC seeks justification for the absence of a CEMP, clarification that the Outline Code of Construction Practice and its appendices provide equivalent controls, and inclusion of additional consultees. The Applicant considers that the Outline Code of Construction Practice and appended plans provide the necessary controls and are secured through Requirement 4. The Applicant will continue to liaise with ECC on the inclusion of additional consultees where necessary.	Resolution of this matter is anticipated by Deadline 6.
3.14.4 – Archaeology	ECC considers that Requirement 5 should be amended to include more explicit provisions for written schemes of investigation, post-excavation assessment, publication, and archive deposition.	Resolution likely by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	The Applicant has amended the draft DCO to incorporate post-excavation provisions and will continue to engage with ECC in respect of intrusive site preparation works.	
3.14.7 – Reinstatement schemes	ECC seeks clarity on the meaning of “former use” and how reinstatement will apply, including within the 10m cable corridor. The Applicant has amended the Draft DCO to refer to “former condition” accordingly and notes that restrictions on reinstatement within 10m of cables are necessary for operational and safety reasons.	Resolution of this matter is anticipated by Deadline 6.
3.14.8 – Decommissioning	ECC seeks further detail on decommissioning impacts and outcomes. The Applicant considers decommissioning activities not reasonably foreseeable, and therefore these have been scoped out of the Environmental Statement. The Applicant notes that all appropriate consents would be sought at the relevant time.	Resolution of this matter is anticipated by Deadline 6.
3.14.9 – Applications made under requirements	ECC considers the proposed decision-making timescales for discharge of requirements too short and requests an extension to at least 56 days. ECC also seeks clarification on when the determination period recommences following submission of further information. 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. Due to the potential role of DESNZ, this matter must form part of discussions moving forward on how this detail in the DCO may need redrafting.	This matter is unlikely to be resolved.
3.14.11 – Fees	ECC is considering the appropriate fee level and seeks longer determination and refund periods, retention of a proportion of fees, and clarification on index linking. The Applicant has amended the Draft DCO to align fees with the national schedule for discharge of conditions. The Applicant consider retention or index linking is not appropriate, and proposes post-consent PPAs to address cost recovery.	Resolution of this matter is anticipated by Deadline 7.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.14.12 – Certified documents	ECC considers stronger controls are required and seeks certification of relevant documents and clearer provision for managing flood risk and drainage. The Applicant considers that adequate controls are already secured through the Outline Code of Construction Practice. The Applicant will continue to liaise with ECC on this matter.	Resolution of this matter is anticipated by Deadline 7.
3.14.13 – Register of requirements	ECC requests that a register of requirements should be maintained by the Applicant. The Applicant will continue to liaise with ECC on this matter in light of the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements.	Matter unlikely to be agreed
3.14.14 – Post-consent programme of ecological mitigation	ECC considers that a BNG delivery plan and ecological mitigation measures should be secured through a DCO Requirement. The Applicant proposes to secure at least 10% BNG through a unilateral undertaking and does not consider additional Requirements necessary. The Applicant will continue to liaise with ECC on this matter.	Resolution of this matter is anticipated by Deadline 7.
3.14.15 – Developer's forum	ECC requests the establishment of a Developers Forum to coordinate and manage cumulative effects. The Applicant will continue to liaise with ECC on this matter.	Resolution of this matter is anticipated by Deadline 7.
3.14.16 – HGV parking	ECC considers that surveys and mitigation for HGV parking should be secured prior to commencement of works, potentially through a requirement or management plan. The Applicant considers that these matters are addressed within the Outline Construction Traffic Management Plan and will continue to liaise with ECC on this matter.	Resolution of this matter is anticipated by Deadline 7.
3.14.17 – Employment and skills plan	ECC seeks an employment and skills plan to be submitted for approval. The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this plan will be secured by a new DCO Requirement.	Resolution of this matter is anticipated by Deadline 6.

SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.14.18 – Health and Wellbeing mitigation and monitoring plan	ECC considers that a dedicated strategy and monitoring plan should be secured through the DCO. The Applicant considers that appropriate mitigation is already secured through Requirement 7 and that no monitoring is required as no significant health and wellbeing effects have been identified.	This matter is unlikely to be resolved.
3.14.19 – Green infrastructure strategy	ECC seeks an additional requirement for a Green Infrastructure Strategy to align measures across documents and ensure delivery of enhancements through detailed design. The Applicant supports environmental net gain and notes that monitoring and delivery are already secured through the Biodiversity Net Gain Report and Outline Landscape and Ecological Management Plan, but will consider opportunities for further enhancement.	Resolution of this matter is anticipated by Deadline 7.
3.14.20 –Submissions for discharge requirements	ECC seeks assurance that submissions will meet an agreed quality standard to enable efficient processing. The Applicant considers this is already addressed through Requirement 4, which requires submissions to be in substantial accordance with the approved outline management plans.	Resolution of this matter is anticipated by Deadline 6.
3.14.21 – Appendix A - DCO Wording	Discussions are ongoing in relation to detailed drafting points on: • Decision-making and approval timescales; • Definition of 'maintain'; • Definition of 'provisional advance authorisation'; • Limits of deviation; • Application of permit schemes; • Discharge of water; • Traffic regulation; • Felling or lopping; • Safeguarding; • Service of notices; • Draft protective provisions; and • Certified documents.	Resolution of this matter is anticipated by Deadline 7.

1.3 Project Description

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

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

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

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

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

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

2. Record of Key Engagement

2.1 Introduction

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

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

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

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and ECC. Further details of ECC's engagement with National Grid, including on the SoCG, is provided in ECC's **Local Impact Report ("LIR")REP1-161]** at section 1.3.

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

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

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

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

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

Date	Format	Topic/Description
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex South)
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex North)
January 2026	Meeting	Meeting to discuss Statement of Common Ground with ECC
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.

Date	Format	Topic/Description
Contaminated Land, Geology and Hydrogeology		
August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).
Health and Wellbeing (including Air Quality and Noise and Vibration)		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
July 2023	Technical Note	National Grid issued a technical note to Environmental Health Officers (EHOs) to agree the approach to the operational noise impact assessment of the proposed EACN Substation.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement.
April 2026	Meeting	Meeting to discuss the Statement of Common Ground.

Date	Format	Topic/Description
Historic Environment		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities (including Essex County Council) to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.

Date	Format	Topic/Description
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Essex County Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment

Date	Format	Topic/Description
February 2025	Email Correspondence	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	National Grid shared additional trench plans for Site 009, Areas 26 and 34
June 2025	Email Correspondence	National Grid shared updated trench plans for Site 009, areas 26 and 34
June 2025	Email Correspondence	National Grid share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011, 012, 013, 014 and 015
September 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011 and 12
September 2025	Email Correspondence	National Grid shared updated SSWSIs sites 11 & 12
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex North)
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex South and Thurrock)

Date	Format	Topic/Description
October 2025	Email	National Grid shared the Trial Trench Plans for review and approval for site 009.011, and 15
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Email	National Grid shapefile for the phase 2 survey along with the priority area survey
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email	National Grid shared the WSI for the Phase 2 geophysical survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss matters relating to built heritage in the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
Hydrology, Land Drainage and Flood Risk		
June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.

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

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

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

Date	Format	Topic/Description
		businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email Correspondence	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the Socio Economics, Recreation and Tourism section of the Environmental Statement (Covering Essex South)
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.
Traffic and Transport		
June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting

Date	Format	Topic/Description
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.
June 2023	Meeting	National Grid held a meeting to discuss the EACN Substation access arrangements with ECC and National Highways.
August 2023	Meeting	National Grid held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities (including ECC).
November 2023	Meeting	National Grid held a PRoW Thematic Group Meeting.
January 2024	Meeting	National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) at the Transport Working Group.
March 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities.
June 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management.
June 2024	Meeting	Meeting to discuss EACN and interaction with North Falls and Five Estuaries wind farm projects, and the proposed Norwich to Tilbury EACN permanent access between Bentley Road and Ardleigh road that would be required.

Date	Format	Topic/Description
July 2024	Email Correspondence	Proposed Abnormal Indivisible Load (AIL) Routes issued for comment.
July 2024	Email Correspondence	ECC 2024 statutory consultation response received.
August 2024	Meeting	National Grid held a Transport Working Group LHA engagement meeting with ECC. Highway mitigation on PARS from 2024 statutory consultation were presented.
September 2024	Meeting	National Grid held a Transport Working Group Meeting with ECC and National Highways to discuss AIL routes. Overview of AIL vehicles provided.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. All affected LHAs were in attendance. Highways Mitigation Design, schedules of works and proposed structure of CWTP were discussed. Confirmation given that ProW surveys and crossover bellmouth RSAs had been scheduled in.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. All affected LHAs were in attendance. Topics discussed included AILs, highway mitigation design, transport planning and multi-modal report.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of TA was presented and an overview provided of the initial capacity assessment methodology.
December 2024	Meeting	National Grid held a LHA Engagement Meeting to discuss potential changes following S42 statutory consultation, visibility splays and traffic management methodology, access for existing utilities and AILs.
January 2025	Meeting	National Grid held a Transport Working Group Meeting. Presented work in progress draft of Transport Assessment. Ran through methodology of junction sifting process, junction assessment methodology and cumulative assessment.
February 2025	Meeting	National Grid held a Transport Working Group Regional. Presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised.
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy.

Date	Format	Topic/Description
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures.
February 2025	Email Correspondence	National Grid issued AIL Structures Register for ECC review and feedback.
March 2025	Meeting	Meeting to run through TA report and comments provided by ECC on their initial review.
March 2025	Meeting	National Grid held a Highway Mitigation Workshop with National Highways to discuss the A12 and A120 junctions in Essex.
March 2025	Email Correspondence	ECC structural feedback for proposed AIL routes received (partial).
March 2025	Email Correspondence	National Grid requested further structural feedback for proposed AIL routes.
April 2025	Meeting	National Grid held a meeting to discuss the AIL process and report with ECC, Essex and Suffolk police.
April 2025	Email Correspondence	National Grid issued updated information pack for proposed AIL routes.
April 2025	Meeting	National Grid held a Traffic and Transport Working Group Meeting. Section 42 targeted consultations closed. Latest updates given relating to engagement on AILS, PROWS and highways modelling.
April 2025	Email Correspondence	ECC structural feedback for proposed AIL routes received (partial, but main piece of feedback received, i.e. AIL structures register issued to ECC in Feb 2025 was returned with comments)
April 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; high-level feedback received from ECC, ECC advising of the process to obtain structural records, requests for structural records by National Grid
May 2025	Email Correspondence	ECC structural feedback for proposed AIL routes received (partial).
June 2025	Meeting	National Grid held a Regional Stakeholder Meeting with ECC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	National Grid held a workshop to discuss the methodology utilised to produce the construction trip generation with ECC.

Date	Format	Topic/Description
June 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial).
July 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial).
August 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial).
August 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
September 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial).
October 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Essex County Council.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Essex County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
October 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to AIL routes/structures; requests for structural record information by National Grid, structural record information shared by ECC (partial).
October 2025	Email Correspondence	National Grid issued structural reviews to ECC for comments and technical approval.
November 2025	Email Correspondence	ECC comments on structural reviews (issued October 2025) received.
November 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes.

Date	Format	Topic/Description
November 2025	Meeting	National Grid held a meeting to discuss Essex County Council's comments on Road Safety Audits and Highway Mitigation.
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the Traffic, Transport and ProW sections of the Environmental Statement.
December 2025	Meeting	National Grid held a Traffic and Transport Working Group Meeting.
December 2025	Email Correspondence	Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes.
January 2026	Meeting	National Grid held a meeting with Essex County Council to discuss the informal consultation comments provided by ECC.
January 2026	Meeting	National Grid held a meeting with Essex County Council to discuss Statements of Common Ground and to review their updated comments.
January 2026	Email Correspondence	National Grid issued an Approval in Principle (AIP) for ECC review and sign-off for assessment of a structure along proposed AIL routes.
January 2026	Email Correspondence	Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes.
February 2026	Meeting	National Grid held a meeting with Essex County Council to discuss ECC's feedback on the Ardleigh Road RSA matters, in particular speed limit changes.
February 2026	Email Correspondence	Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes.
February 2026	Email Correspondence	National Grid issued an AIP for ECC review and sign-off for assessment of a structure along proposed AIL routes.
February 2026	Email Correspondence	Various emails exchanged between National Grid and ECC relating to technical approval/sign-off of structural reviews for structures along proposed AIL routes.
March 2026	Meeting	National Grid held a meeting with Essex County Council to discuss the TRO approach for Norwich to Tilbury.

Date	Format	Topic/Description
March 2026	Email Correspondence	National Grid issued an AIP for ECC review and sign-off for assessment of a structure along proposed AIL routes.
March 2026	Email Correspondence	National Grid requested structural record information for some structures along proposed AIL routes.
March 2026	Email Correspondence	ECC structural record information received (partial).
April 2026	Email Correspondence	ECC structural record information received (partial).
May 2026	Meeting	National Grid held a meeting with ECC to discuss Statements of Common Ground and to review their updated comments.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

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

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

Table 3.1 Agreement status for matters presented in Section 3

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 3.15 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	Essex County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. 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 ReportsREP2-030].** The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]**. ECC's 'In Principle Strategic Objection' is further detailed within its **LIRREP1-161] and other** submissions to this Examination ECC accepts that network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted / planned electricity generation in the East Anglia region. However, despite the acceptance of the need, ECC's in-principle objection continues to be for this need to be met using an integrated offshore solution that avoids the use of overhead powerlines due to their impact on communities and the environment. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed. ECC accepts this is now for the ExA to consider.	Not Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-**	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner Licence) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Annex 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. 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 ReportsREP2-030]** 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.	**1083]** and to Section 4.2 of its **LIRREP1-161] which pro**vide detail on ECC's 'In Principle Strategic Objection' alongside other submissions to the Examination ECC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While ECC has had regard to the TEC Register, ECC considers it essential that in determining what future expansion is needed, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Applicant must not restrict the justification on future network expansion solely based on the ESO contracted position. Further engagement would be welcomed on this matter. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed ECC accepts this is now for the ExA to consider.	
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]** and to Section 4.2 of its **LIRREP1-161] which pro**vide detail on . ECC's 'In Principle Strategic Objection'. Alongside other submissions to the Examination	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		and not meet the needs case for Norwich to Tilbury. 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. 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 ReportsREP2-030]** The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed	ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment. The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts including landscape and visual impacts. ECC's position is that, if indeed the timing for the network reinforcement is less acute as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding). Given the stage of the DCO and the engagement thus far between the parties, ECC accepts that the opportunity has passed for meaningful discussion as to whether there are alternatives which would achieve better environmental outcomes overall than the current submitted scheme, and if so, put them forward at pace to achieve the required network reinforcement instead of the submitted scheme ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ECC accepts this is now for the ExA to consider.	
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. 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. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic bills. 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 ReportsREP2-030].** The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]** and to Section 4.2 of its **LIRREP1-161] which pro**vide detail on ECC's 'In Principle Strategic Objection' alongside other submissions to the Examination. ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment. Localised design responses involving undergrounding and /or alternate pylon design as part of the application of the mitigation hierarchy, should not be discounted by NG. The County Council consider such an approach would not be contrary to national policy statements and would actually be consistent with Holford Rule 7 where it states projects should be routed to minimise as far as possible effects on development. ECC contends that insufficient weight has been to the effects of development on existing and / or planned development as well as broader strategic objectives to deliver new homes, to	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		therefore suggest this matter is moved to Not Agreed	inform more appropriate localised design responses. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed ECC accepts this is now for the ExA to consider.	
3.2.5	Policy compliance	In deciding an application for development consent Section 104 of the Planning Act 2008 requires the Secretary of State to determine the application in accordance with any relevant National Policy Statement (NPS). The NPSs relevant to this project are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) which came into force in January 2024. The National Policy Statement for Renewable Energy (EN-3 2024) also includes support for the onshore infrastructure required to deliver new offshore wind developments. Norwich to Tilbury has been developed in line with these National Planning Policies, and more information can be found in **7.21 2024 - Design Development Report for the Project APP-359]** and **5.15 Design Development ReportAPP-122]**. For the Applicant's position on policy compliance, please refer to Section 4.2 'Planning Policy' in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	ECC acknowledges the Applicants position set out in Section 4.2 'Planning Policy' in 8.8.2 Applicant's Comments on **Local Impact ReportsREP2-030].** ECC also acknowledges that the SoS must determine a DCO application in accordance with the relevant NPS, unless one of a range of specified exceptions applies and that notwithstanding this is a project with CNP status to be applied following the application of the mitigation hierarchy, a decision can be made other than in accordance with the NPS and in accordance with S104(7) of the Planning Act 2008, where the adverse impact and of the proposed development would outweigh its benefits of the project. Due to the nature of going discussions regarding the approach to mitigation, ECC considers this should remain Under Discussion.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Project development process – Design				
3.2.6	Dunton Hills Garden Village	For the Applicant's position on Dunton Hills Garden Village, please refer to Section 3.8 'Alternatives – Dunton Hills Garden Village' and Appendix B in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030].**	ECC refers to section 4.2 of its Local Impact Report **[REP1-161]** where it sets out its concerns regarding the impact of the project on the development of DHGV. Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. ECC therefore maintains this will degrade the principles of a Garden Village and based on the conclusions of the Savills report(refs) considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing, affordable housing and infrastructure. Given the current housing need within Basildon / Brentwood and across the region, the importance of this development in terms of numbers and infrastructure being delivered, this situation is not acceptable to ECC. ECC is disappointed that more weight was not given to an alternative design solution and / or mitigation along this section of the proposed route that avoided any impact on the development of DHGV. While ECC maintains an in principle objection to the proposed siting of the pylons and alignment of the route of the OHL along this section of the route, it acknowledges the Applicants comments on ECC's LIR **[REP2-030]**and is in discussion with	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			the Applicant to secure appropriate landscape mitigation.	
3.2.6a	Dunton Hills Garden Village – Technology choice	National Grid has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5. **7.21 2024 - Design Development Report for the ProjectAPP-359]** identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed master planning, would substantially mitigate potential effects on developable land and indirect effects.	As set out within the Local Impact Report **[REP1-161]** it is recognised that as a matter of principle, overhead power lines are referenced in Government policy (NPS-EN5) as the starting presumption for electricity network developments. Nevertheless, in this instance consistent with paragraph 2.9.7 of EN5 it is considered the effects of new overhead lines would give rise to adverse landscape and visual impacts, and in such situations, national policy would support the use of alternative technological solutions . The recent receipt of additional information from the Applicant on the potential implications for the det developable area, it is accepted that the use of underground cabling along the eastern edge of DHGV, given the constraints of the existing high pressure gas pipeline and heritage assts would further encroach on the net developable area for DHGV. If the routing of the OHL along the eastern edge of DHGV is accepted, the option of undergrounding the cables is reluctantly conceded as not being feasible without impact on the housing numbers to be delivered by the residential development..	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Suggest this matter is considered agreed in respect of Undergrounding the cables	
3.2.6b	Dunton Hills Garden Village – T-pylons	**5.15 Design Development ReportAPP-122]** sets out that where there is not a reversal of the presumption within EN-5 to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations where there could be a design preference for T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not considered to be engaged and, accordingly, there is no justification for T-pylons to be used on the Project.	ECC consider that placing the route underground for the length that it runs through / alongside the Garden Village would accord with the principles of good design and minimise the impact, safeguarding the viability and deliverability of DHGV. If this is not feasible, alternate pylon design should be considered alongside any identified mitigation to minimise the impact of the Norwich to Tilbury project. While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), ECC considers greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. ECC also notes that, in APP-122, the Applicant addressed DHGV in section 10.4, but only considered re-routing the development as mitigation. The use of T-pylons has not obviously been considered as part of the design development. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Applicant is noted but ECC considers this architectural solution would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV. ECC is in discussion with the Applicant and is awaiting further information regarding options for potential mitigation.	
3.2.6c	Dunton Hills Garden Village – ability of overhead lines and housing developments to co-exist	Overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice.	ECC acknowledges that it is possible for new residential developments to co exist in proximity to overhead powerlines and that the proposed residential development does not conflict wihtt National Grids Design Guidelines for Development near High Voltage Overhead Lines. The objective of the DHGV and the Garden Communities Programme as evidenced through the Dunton Hill Garden Village Framework Masterplan and the Dunton Hill Garden Village SPD, is to create distinctive, high-quality, sustainable communities, which as exemplars of design, go beyond the qualities of 'standard' housing developments As set out in ECC's **LIRREP1-161], its view** is that the presence of overhead powerlines and pylons along the eastern edge of the development offer no potential to enhance the quality of the landscape or the amenity of DHGV. In these specific circumstaces therefoer, ECC maintains that in the absence of any agreed mititgation, this will degrade the design principles of DHGV Garden Village.	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.2.6d	Dunton Hills Garden Village – effect of the project on the quantum of development	The Applicant does not consider there needs to be a direct impact on the quantum of development at Dunton Hills Garden Village. The Project has been designed to follow an existing gas pipeline through and within a corridor formed by the Building Proximity Distance in the vicinity of the Dunton Hills Garden Village proposal to reduce potential effects.	Subject to final discussions with LIH, ECC acknowledges that the route alignment should not affect the quantum of development proposed at DHGV. ECC is concerned however about any about the impact on viability and the consequential impact on the ability to deliver policy compliant number of affordable housing as ou8tlined in the **Savills ReportREP4-328 Appendix B]**. Any negative impact of the overhead power lines in terms of viability should not be used as a reason to reduce policy target affordable housing provision upon which this scheme was based. ECC believes the power line scheme should leave a neutral impact on affordable housing provision and targets.	Not Agreed
3.2.6e	Dunton Hills Garden Village – viability, gross development value and landowner compensation	The Project should not impact GDV to any meaningful significant extent, certainly not enough to impact viability, and that any loss that may be suffered will be suffered by the landowner (in land value) and for which they have a recourse to compensation	The comments by the Applicant (paragraph 3.8.47 to 3.8.57 of their response to ECC's **LIRREP2-030]**) on the Savills report commissioned by ECC have been reviewed and a further report by Savills was submitted as part of the **Council's Deadline 4 submissionREP4-328].** The report concluded that there is a significant risk that the proposed overhead power lines could materially impact on the viability and deliverability of the Dunton Hills scheme and a more certain way to proceed would be to pursue the option of underground power lines across the site or other forms of mitigation to be agreed with the relevant planning authority.	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			It also noted that on the specifics of affordable housing viability is a material consideration and planning policy. The power line scheme should leave a neutral impact on affordable housing provision and targets.	
3.2.6f	Dunton Hills Garden Village – location of the play area to the south eastern corner of the DHGV site	Based on the current plans, the Project will not directly affect the location of the play area (referred to as a Local Equipment Area for Play or LEAP). Land around and underneath the proposed overhead line can be utilised by DHGV as open space as per the relevant masterplan. The DHGV site is still at the formative stage and the play area in question is located in phase 3A, planned for development in years 13-15. The Applicant is of the opinion that given the phasing, it is likely that phase 3A of DHGV would move into detailed design and the associated planning application(s) with the new overhead line in operation, therefore the play area could be located sensitively to the Project and both can co-exist accordingly.	ECC acknowledges that potential exists to relocate the LEAP play area. It considers this matter can be moved to agreed	Agree
3.2.6g	Dunton Hills Garden Village – tree planting	The Applicant will seek to work with the landowner (LIH), Essex County Council and Brentwood Borough Council in relation to the DHGV site to explore and understand the requests for further tree planting in this area	ECC understands that following a meeting with the Applicant on 31/03/26, the Applicant will consider what the landscape compensation could be as mitigation for the harm to DHGV. ECC would welcome further engagement on this and is keen to ensure this is secured accordingly.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.2.7	Design principles	The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational reliability, can significantly limit National Grid's ability to adapt the aesthetic appearance of its infrastructure. Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules (relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals. While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and documented through the Development Consent Order process. Furthermore, NPS EN-1 encourages developers "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible"	ECC would refer to its **Local Impact ReportREP3-0161]** would concerns about the approach to design are outlined The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Further, the Council also draws on the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design which has been prepared based on good practice and applicants are encouraged to follow the recommendations set out. In particular, it is noted the advice states "Good design is crucial for achieving excellent functionality, sustainability, positive place-making and resilience in NSIPs". The Council feels there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. It is supportive of the concerns raised by Tending District Council regarding the impact of the proposed infrastructure on the environment around Ardleigh. ECC expects to see the Applicant working alongside the promoters of North Falls (EN010119), Five Estuaries (EN010115) and Tarchon Interconnector, to ensure a joined up approach in the design of the infrastructure located in	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		within the bounds of functional and safety constraints. The Planning Inspectorate Good Design advice advises that 'Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important'. EN-1 refers to the importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the **7.15 Design and Access StatementREP2-020]**. For the Applicant's position on Design principles, please refer to Section 3.9 'Good Design' in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030].**	Ardleigh, and would expect engagement in any design review processes. ECC would wish to see commitments around the issue of design informing the draft DCO / Schedule of Requirements. NGET must follow a good design process to ensuring that the infrastructure proposed remains functional and safe while giving sufficient consideration to and realising the best local design and environmental outcomes for the project. ECC would also refer to its response to ExQ1 question DES 1.3 from **[REP3-078]**, including the need for the project to undergo independent design review, and the need for this to be secured appropriately through the DCO.	
Project development process - Consultation				
3.2.8	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation and responses to feedback received during consultation are included in **5.1 Consultation Report - Appendix B: 2022 non-statutory consultationAPP-068].** The non-statutory consultation was undertaken in accordance with the published Consultation Strategy. Noting this matter has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'	ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25(AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application. ECC refers to its response to this consultation dated 16th June 2022 and to its response to the	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Adequacy of Consultation dated 15.09.25(AoC-009).	
3.2.9	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in **5.1 Consultation Report - Appendix C: 2023 non-statutory consultationAPP-069]**. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy. Noting this matter has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'	ECC acknowledged the non-statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25 (AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application. ECC refers to its response to this consultation dated 14th August 2023 and to its response to the Adequacy of Consultation dated 15.09.25 (AoC-009)...	Agreed
3.2.10	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in **5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidenceAPP-071]**. Responses to feedback received during statutory consultation are available within **5.1 Consultation ReportAPP-066]**. The statutory consultation was undertaken in accordance with the published SoCC.	ECC acknowledged the statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25(AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application ECC refers to its response to this consultation dated 26th July 2024 and to its response to the	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Noting this matter has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'	Adequacy of Consultation dated 15.09.25 (AoC-009).	
3.2.11	2025 targeted consultation	Targeted consultations for Essex took place from 25 February - 27 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within **5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-077].** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. 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). Noting this matter has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'	ECC acknowledged the non-statutory targeted consultation was undertaken in accordance with the Targeted Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25 (AoC-009). ECC refers to its response to this consultation dated 15 April 2025 and to its response to the Adequacy of Consultation dated 15.09.25 wherein comments on the consultation were made.	Agreed
Other matters as required				
3.2.12	Community benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ,	ECC considered Norwich to Tilbury (N2T) will have extensive residual impacts that adversely affect the local economy and environment, as	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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 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.	well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Also, the national benefits will not offset the harm at a local level. ECC have strongly encouraged the Applicant to respond positively to the issue of social value and community benefits as set out various stages of the NSIP process particularly having regard to the Governments r published Community Funds for Transmission Infrastructure. Significant benefits should be realised from N2T for education, skills, and employment during construction and operation, alone and cumulatively with other NSIPs. With reference to ECC's Relevant Representation submission (27 November 2025), section 2 ECC's Pre-application Engagement with the Applicant **[RR-1083]** there has been little progress from National Grid on this matter. It is considered that this will be a key area of focus for ECC. ECC would expect to be consulted on this matter to ensure that where community funds are delivered, real long lasting benefits are delivered for the communities impacted by the development. Although it is recognised this matter is not a material consideration in the decision on the proposed project, given the importance of this issue, this matter remains Under Discussion until meaningful engagement takes place between National Grid and ECC.	

3.3 Ecology and Biodiversity

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	The ES has identified the relevant legislation, policy and guidance. EPS 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	The study area was agreed through **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits**AS-026 to AS-045]**.	Sufficient desktop data has been collected for the ES. EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to bat survey data which requires further information and is noted in ID 3.3.18.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.3.4	Assessment Methodology	National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species, including water voles have been agreed with Natural England.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement/ comment. All methodologies for surveying licensable species have been agreed with Natural England.	The survey methods used are largely accepted, although note the comments made for ID 3.3.11. EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to survey methodology for bats which requires further information.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. The key parameters and assumptions presented are considered appropriate. National Grid has committed to a 5-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for development consent projects of this scale. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain ReportAPP-299]**.	The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "*Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4))*", is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ECC acknowledges the Applicants position that a 5 year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), is considered sufficient. However, after further consideration, ECC considers this period of aftercare and management is insufficient and leaves open a credible possibility of a high failure rate detrimental to the quality of replacement planting. ECC remains open for further discussion on this matter and would like to explore with the Applicant appropriate commitments to high-quality care within the 5yr management period.	
EIA – Baseline Conditions				
3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline conditions and receptors for bats which requires further information.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.9	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** and set out in the **7.2 Outline Code of Construction PracticeREP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Draft LEMP documents have been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions to those documents. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID 3.3.21.	Agreed
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.21). ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
EIA – Assessment Conclusions				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental**	It would be useful transparency to advise on how long it is predicted to take for the long-	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Statement Chapter 8 - Ecology and BiodiversityAS-026]. The assessment of effects during construction presented is considered appropriate. Tables 8.23 and 8.24 within **6.8 Environmental Statement Chapter 8 Ecology and BiodiversityAS-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 outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural EnglandREP4-081]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential	term neutrality to be achieved for the affected receptors. The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision. ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation. Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, "*the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees*any number of which could be classified PRF-M after further survey] *and 16 trees with hibernation features.*" As a consequence of the restricted survey effort, there is no quantitative transparency as	

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		roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. Refer to Table 4.10 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]** for a more detailed response on bat surveys. Following a meeting in May 2026 National Grid submitted to the Local PlanningAuthorities 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.	to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected. The potential impact without any mitigation measures being applied is described in the ES Table 8.23: "*In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within the Order Limits. Effects would be considered significant*." However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s) (i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.9, this is not considered to be a reasonably supported assessment. What is being proposed is a quasi District Level Licence-type approach for roosting bats	

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			(i.e. getting DCO without first completing surveys), when ECC is not aware of any such DLL method for bats having been trialled and approved. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that concerns regarding the effects of construction remain and that this matter requires further discussion. Further to a meeting with the Applicant / Arcadis on 23/04/26, where ECC's position was clarified, the ongoing discourse is currently focusing on securing an agreed level of bat roost tree resource compensation. June 2026 update NG's proposal for "*the provision of bat boxes/ veteranisation of 10% of the*potential] *bat roosting features lost in any one Project Section*", made in 19 May 2026 meeting, is broadly acceptable, although that is with the correction made to the statement above. Any actual roost features should already require compensation under the method statement of a Natural England mitigation licence. What remains to discuss, is how the bat boxes / veteranisation should be distributed to best effect. Potentially. box distribution needs to be left to an ECoW to decide after all surveys, but they should be guided by advice points included in the LEMP. As for the sharing of 8.9.1.1 Addendum to ExQ1 BIO 1.6 - **Advice Letter on bats and letters of no impediment from Natural**	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			EnglandREP4-307], that is welcomed. However, ECC is not inclined to wholly agree it "…*states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed*". It appears that Natural England has made some further information requests that suggest concerns similar to those expressed by ECC. This matter therefore remains in discussion.	
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) is considered appropriate. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	**7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** and is appropriate for managing construction impacts from the Project. The Project role and responsibilities of the various clerk of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of **7.4 Outline Landscape and Ecological Management PlanREP3-030].** The various Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice. These roles	The Outline CoCP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 22 November 2024 and 19 February 2025. Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, ECC would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. ECC would also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project.	Under Discussion

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		would be delivered by multiple individuals across the Project, depending on the specific requirement/task. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further detail on the multiple specific individuals undertaking these roles would be available post-consent as part of the final Landscape and Ecological Management Plan/s. The remit of the Ecology Working Group will include review of individuals within the core ECoW team (once known post-consent), as a mechanism to demonstrate individuals have sufficient ECoW experience to adequately fulfil the role.	B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey class licensed (level 2+ if endoscoping required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification. B16 – see comments for ID 3.3.9. This issue remains under review and the subject of ongoing discussion. Following a meeting with the Applicant / Arcadis on 23/04/26, ECC believes there is common ground in the desire to ensure effective ECoW function during the construction phase of the project. At this meeting ECC and the Applicant / Arcadis agreed to consider further on a suitable description of the necessary qualifications/experience required of a ECoW. One possibility mentioned was for an Ecology Advisory Board to review (and presumably vet?) and give approval for appointed ECoWs. With more detail, ECC is not adverse to this approach in principle. Agreement has almost been reached regarding a method to assure that the ECoWs engaged are fit for purpose.	
3.3.14	Outline LEMP	**7.4 Outline Landscape and Ecological Management PlanREP3-030]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** and is appropriate. Natural England, as the primary statutory advisor and competent authority on roosting	The Outline LEMP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19th February 2025. With respect to paragraph 6.1.8, clarity regarding the criteria used for defining a tree's bat hibernation potential is sought? Given that	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		bats, has approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility. 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.	there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features? ECC remains of the opinion that the evaluation undertaken is not properly acknowledging the full extent of trees with hibernation roost potential. However, ECC hopes this this can be addressed under the discussion concerning the compensation offering for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.	
Other matters as required				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. The **7.1 Biodiversity Net Gain ReportAPP-299]** sets out the approach to BNG. National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.	ECC 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. This includes clarity on the application of the mitigation hierarchy, transparent accounting to avoid double-counting, governance and monitoring arrangements, and how on-site BNG delivery	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		National Grid will continue to engage with ECC on this matter.	aligns with the Essex Local Nature Recovery Strategy. ECC considers that there must be confidence in the reinstatement planting being effective and achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur.	
3.3.16	Biodiversity Net Gain (BNG) - Offsite	National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. **7.1 Biodiversity Net Gain ReportAPP-299]** sets out the approach to BNG. Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain ReportAPP-299],** the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others, including the local nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances. Offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.	While the basic approach of the Applicant to the delivery of BNG is noted, further detail on how offsite BNG is to be delivered is required. In particular, location, governance, and delivery of offsite BNG must be clarified – simply indicating offsite BNG will be secured by a legal agreement and delivered through collaboration with partners is too general to allow ECC to agree Furthermore, ECC seeks greater certainty and commitment on how offsite BNG will be spatially aligned with the Essex Local Nature Recovery Strategy, the extent to which delivery within Essex will be prioritised, the role of local delivery partners, and the mechanisms for securing long term management, monitoring, and stewardship.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.3.17	Arboriculture Impact Assessment (AIA)	The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including appendices B to KAPP-296]** and is considered appropriate for this stage of the project.	This remains Under Discussion pending agreement to proposed mitigation.	Under Discussion
3.3.18	Data sources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026].** Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated version of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** which was submitted to the Planning Inspectorate in November 2025. The provision of this additional data does not change the conclusions of the assessment submitted in August 2025. All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8: Ecology and BiodiversityAPP-158].** The Applicant considers that since additional survey results were submitted in November 2025 this matter can be moved to Agreed	As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending. As late November 2025, ecological surveys have been completed on all but 3% of the total land within the Order Limits. This is not considered an excessive or unreasonable omission given the overall area covered by the Order Limits and the inevitability of certain access constraints. Refer to June update in point 3.3.11	Under Discussion
3.3.19	Survey Methodology (Bats)	The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural EnglandREP4-081]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level	Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECC believes further survey effort prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data-based estimation of the	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. Due to the transient nature of bat tree roosts, pre-construction surveys would be undertaken of all trees due to be lost with suitability to be used by roosting bats, to confirm the presence/absence of roosting bats, prior to felling/pruning. Where the presence of a roost is confirmed, mitigation measures, as agreed with Natural England, would be delivered under licence to ensure no impact on the favourable conservation of bats. A draft Project wide bat licence has been prepared through consultation with Natural England where likely impacts and appropriate mitigation measures for each different species and roost type likely to be encountered are given. The draft Project-wide licence has been prepared where likely impacts have been assessed and a percentage of all trees with PRFs likely to support roosting bats has been agreed with Natural England. The draft Project-wide licence sets out appropriate mitigation measures for each different species and roost type likely to be encountered and includes measures such as provision of bat boxes and tree veternatisation. Natural England has been consulted throughout the survey design and development of the mitigation	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. ECC accepts the reasoning for a bespoke bat roost tree survey method. However, ECC is of the opinion that the limitations of the survey method used need to be acknowledged and reflected by a conceded degree of uncertainty in the impact assessment. That impact assessment uncertainty then needs to be counteracted by a suitably precautionary mitigation plan. ECC hopes this matter can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		approach as presented within the draft licence and are in support of the approach. 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 EnglandREP4-307].** This letter states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed.		
3.3.20	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. The baseline conditions and receptors presented are considered appropriate. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural EnglandREP4-081]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** includes a reasonable worst-case assessment of impacts on potential roost features.	ECC is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review. ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.	Under Discussion
3.3.21	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of	Measure B16's assumption that any action requiring a Natural England derogation licence can be "*reasonably anticipated to maintain the*	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026] and set out in **7.2 Outline Code of Construction PracticeREP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The bat roost survey scope was agreed with Natural England, as evidenced **within 5.9.13 Draft Statement of Common Ground - Natural EnglandREP4-081]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** includes a reasonable worst-case assessment of impacts on potential roost features.	*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. ECC is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review. ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11.	

3.4 Green Infrastructure

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Ecology and Biodiversity Matters				
3.4.1	Data sources (Ecology Matters)	The Applicant confirms that a robust evidence base, including desk-based and field survey data, was used in the environmental assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. This is considered sufficient to inform the assessment. As such, the LNRS has not been used to inform the baseline characterisation or impact assessment of existing habitats. Notwithstanding this, the Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances.	ECC consider the Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study to inform the identification of existing habitats and to guide the selection of appropriate locations for mitigation and compensation measures. While ECC recognises the value of field survey data in establishing site specific baseline conditions, the LNRS provides a spatial framework for identifying strategic ecological networks, opportunity areas, and priorities for nature recovery across Essex. Including LNRS mapping supports alignment with national policy objectives and coordinated, cross-boundary environmental planning that reflects local priorities and ecological networks. ECC would welcome the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, to inform the identification and spatial alignment of mitigation, compensation and enhancement measures associated with the Project where relevant within Essex, and not solely in the context of off-site BNG delivery.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.4.2	Standard mitigation	The Applicant acknowledges ECC's request to further integrate Green Infrastructure principles within the mitigation hierarchy. The Applicant confirms that the Project has been developed in accordance with the mitigation hierarchy. The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project. The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate. Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]** and set out in the **7.2 Outline Code of Construction Practice REP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	ECC welcomes the inclusion of embedded and standard mitigation measures within the Outline LEMP and CoCP. However, ECC considers that further integration of GI principles within the mitigation hierarchy should be demonstrated by the Applicant which would strengthen the approach, ensuring that ecological, hydrological, landscape, and community functions are delivered in a coordinated and multifunctional manner. GI should be designed to maximise benefits, such as flood mitigation, biodiversity enhancement, and community wellbeing. ECC would recommend that GI corridors be aligned with existing ecological networks and PRoW to enhance connectivity and accessibility, particularly in areas of landscape sensitivity and community use. ECC would welcome further discussion with the Applicant on the approach to mitigation and how the Project has been developed in accordance with the mitigation hierarchy to better understand how these issues have been captured as part of the design evolution.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.4.3	Additional mitigation	The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project. The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **7.1 Biodiversity Net Gain ReportAPP-299]** highlights that the Order Limit Hedgerows are to be enhanced to meet the minimum net gain requirement (+10 %), including native species as highlighted in **7.4 Outline Landscape and Ecological Management PlanREP3-030]** The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain ReportAPP-299]**. National Grid also aims to deliver biodiversity legacy within the three counties crossed by the Project (Norfolk, Suffolk and Essex).	Green Infrastructure delivery should be explicitly aligned with the Essex GI Strategy and Essex GI Standards and reflect the priorities identified in the Essex LNRS, ensuring that mitigation and enhancement measures contribute to wider landscape-scale recovery. Where habitats such as hedgerows and trees are removed, they should be reinstated with enhanced hedgerow habitats using locally important native species and local seed stock, in consultation with wildlife groups across Essex. ECC continues to seek discussions be held to secure biodiversity and landscape compensation within Essex, with a preference for delivery within opportunity areas identified in the Essex LNRS. To ensure long-term ecological benefits, ECC also encourages the establishment of stewardship agreements with local wildlife groups such as Essex Wildlife Trust, ECC, Place Services, and relevant Local Authorities. ECC also awaits details from the Applicant regarding the procurement process for securing BNG.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.4.4	Outline LEMP	The Applicant acknowledges ECC's request to extend the monitoring period for landscape to 10 years and to secure a 30-year management period for BNG and associated GI. The Applicant confirms that a five-year monitoring period for tree and hedgerow planting is proposed. This is considered sufficient to demonstrate successful establishment and is consistent with the approach taken on other recent NSIPs, including those promoted by National Grid. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain ReportAPP-299].** The Applicant considers that this combined approach ensures both effective establishment of mitigation and delivery longer-term environment benefits. The Applicant will continue to engage with ECC on the detail of management proposals; however, the proposed monitoring period is considered appropriate. **7.4 Outline Landscape and Ecological Management PlanREP3-030]]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and BiodiversityAS-026]**). The Applicant notes that ECC (in **Written post-hearing submissions; summaries of and responses to oral submissions made at hearings held during week commencing 27 April 2026REP4-328]**) welcomes the updates	ECC welcomes the Applicant's commitment to a 30□year management and maintenance period for Biodiversity Net Gain and associated Green Infrastructure within Environmental Areas but seeks clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery.ECC recommends that the Outline LEMP include a robust monitoring framework incorporating adaptive management provisions and opportunities for stakeholder engagement to ensure the longevity and effectiveness of Gi and BNG measures. ECC recommends that the BNG delivery is clearly cross referenced within the Outline LEMP, supported by a transparent monitoring framework, including adaptive management provisions and community engagement. ECC recommends extending the monitoring period for landscape (GI) delivery to 10 years, in line with best practice demonstrated by other NSIPs including Five Estuaries and North Falls Offshore Wind Farms. ECC considers that the proposed monitoring period could be structured into two phases: comprising an initial 5-year period of high-frequency establishment monitoring, followed by a further 5-year period of lower-frequency development monitoring, to demonstrate successful long-term establishment and functionality.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		made in **7.4 Outline Landscape and Ecological Management PlanREP3-030]** related to 'governance arrangements, monitoring and aftercare (including long-term management for BNG Environmental Areas), adaptive management, stakeholder engagement mechanisms, and the distinction between mitigation, enhancement and compensation, with appropriate cross-referencing to the Biodiversity Net Gain Report'. It is recommended that these issues are identified as Agreed, with the point on the duration of the management and monitoring (aftercare) period remaining under discussion at this time. Detail on habitat management and monitoring for the Environmental Areas will be set out in the final Landscape and Ecological Management Plan post consent.		
3.4.5	Biodiversity Net Gain (BNG)	The Applicant acknowledges ECC's request to adopt a higher figure than the minimum 10% BNG. While there is no current legal obligation for BNG on NSIPs, the Applicant's approach to BNG has been to meet the policy requirements within the national policy statements, deliver its corporate commitments of at least 10% BNG with wider benefits, maximise the benefits and value from consumer-funded BNG and to follow the spirit of the Town and Country Planning Act 1990 BNG legislation and guidance including using the Statutory Biodiversity Metric. The Applicant recognises the value of the LNRS in guiding future habitat enhancement and	ECC supports the commitment to deliver at least 10% BNG. The Essex Local Nature Partnership (including LPAs) are working towards a joint approach to BNG, including potential joint specific measurable targets (20% BNG). It is recommended that National Grid consider adopting a higher figure than the minimum 10% requirement within the Environment Act (2021). ECC and the Essex Local Nature Partnership has published its `Viability Assessment of Biodiversity Net Gain in Essex, February 2025'. The viability assessments demonstrate that a 20% BNG is achievable and viable and meets the NPPF requirements, which emphasises	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant welcomes the opportunity to discuss the Biodiversity Net Gain Report further with ECC. The final Landscape and Ecological Management Plan, which will require approval from the relevant planning authorities, will include habitat monitoring and management plans for each of the Environmental Areas.	measurable net gains for biodiversity and would encourage the Applicant to explore opportunities to maximise the biodiversity benefits arising from the proposal. ECC would encourage National Grid to demonstrate it's consideration of the LNRS in the identification and delivery of offsite BNG sites to ensure that BNG delivery is spatially aligned with the LNRSensuring that habitat creation and enhancement contribute to strategic ecological networks and priority areas identified within the LNRS. ECC would recommend that offsite BNG proposals be co-developed with local stakeholders and LNRS delivery partners to ensure strategic alignment and long-term ecological value. Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions. Transparent accounting is required to distinguish between mitigation, enhancement, and compensation to avoid double-counting BNG. ECC recommends that the delivery of Biodiversity Net Gain is supported by a Habitat Management and Monitoring Plan to be secured through the Development Consent Order.. To ensure that the agreed net gain in biodiversity is implemented, monitored and maintained for a minimum period of 30-year	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			period, in line with best practice and the Applicant's stated commitments.	
Landscape and Visual				
3.4.6	Embedded mitigation (Landscape and Visual)	The Applicant acknowledges ECC's recommendation to use GI as a key component of landscape mitigation. The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project. The Applicant confirms that wider environmental and societal benefits will be considered and reported on in the Biodivesity Net Gain Report, delivered post-consent. The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances. 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 VisualAPP-226]**. Embedded	ECC recommends that Green Infrastructure be used as a key component of landscape mitigation, particularly in areas of high visual sensitivity and community use. ECC supports the use of planting and habitat creation to soften visual impacts and enhance landscape character, and requests that GI proposals be aligned with LNRS priorities and local landscape strategies. ECC would welcome the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, and would refer to commentary raised at 3.4.1	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Section 2.5 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project.		
3.4.7	Additional mitigation (Landscape and Visual)	The Applicant acknowledges ECC's recommendation to explore a range of compensation measures to offset the impacts of the Project and deliver BNG. The Applicant's BNG approach seeks to ensure that biodiversity creation and enhancement is delivered in the right places for nature, is aligned policy, and managed appropriately. The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate. The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13**	ECC notes that significant residual landscape and visual impacts remain. ECC recommends that National Grid explore a range of compensation measures to offset the impacts of the proposal and deliver net environmental gain. These should include the enhancement of existing GI assets, investment in community-led landscape initiatives, and the creation of new accessible, high-quality GI open spaces across Essex. Such measures would contribute to improved environmental outcomes and support the wider objectives of nature recovery and community wellbeing. Discussions have taken place with Place Services, Essex Wildlife Trust, the Biodiversity Net Gain (BNG) Officer, and the Local Nature Recovery Strategy (LNRS) Coordinator to explore opportunities for securing potential compensation measures and financial contribution within Essex. ECC recommends securing off-site compensation within Essex, ideally in LNRS strategic habitat opportunity areas, and establishing long-term stewardship agreements with wildlife groups across Essex such as Essex Wildlife Trust, and ECC and other Local Authorities.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Environmental Statement Chapter 13 - Landscape and VisualAPP-226]. Section 2.5 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project. The Applicant's position on landscape mitigation and compensation is also set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**.	ECC would also the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, as referred to in 3.4.1	
3.4.8	Outline LEMP (Landscape and Visual)	**7.4 Outline Landscape and Ecological Management PlanREP3-030]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]** and is appropriate. The Applicant's position on landscape compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030**]. There has been no change in approach or shift in terminology from essential mitigation (necessary to further reduce significant environmental effects) to compensation (does not reduce or overcome an adverse effect) in the **7.4 Outline Landscape and Ecological Management PlanRevision E]** – latest version to be submitted at Deadline 5. ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from "enhanced mitigation" to "landscape compensation" require clarification to ensure these are not repurposed mitigation measures, risking double-counting. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence. ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions and would welcome ongoing discussions with the Applicant on landscape compensation proposals..	Under Discussion

3.5 Contaminated Land, Geology and Hydrogeology

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Approach and Methods				
3.5.1	Study area	The study area was agreed through **6.19 Scoping ReportAPP-288]** to**APP-296]** and **6.20 Scoping OpinionAPP-297]** Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.2	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	ECC confirmed on 17 October in the review of the Statement of Common Ground that this matter has been appropriately dealt with therefore the status has been changed to agreed.	Agreed
EIA – Assessment Conclusions				
3.5.3	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and HydrogeologyAPP-181].** The assessment of effects during operation (and maintenance) presented is considered appropriate. National Grid has considered these potential future mineral extraction sites as part of project development, including a revised design following consultation. This is addressed in the **2025 Design Development ReportAPP-122]**, para 6.5.31. The Applicant is engaging with SRC Group regarding mineral sites A85 and A86, captured in	ECC's **LIRREP1-161] and ECC's** response to the ExQ1 MW1.1 & MW1.2**REP3-078]** sets out the Councils position regarding the safeguarding of mineral deposits The Applicants Mineral s Resource Assessment (APP-183) at Paragraph 9.5.17 confirms that the Order Limits and Study Area overlap with several Candidate sites that have been submitted for future allocation under the MWPA's Call for Sites for the emerging Essex Minerals Local Plan. ECC recognises that engagement between the Applicant and existing and Candidate Site promoters is ongoing with discussions focussing on potential route variations to	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		8.3.28 Draft Statement of Common Ground – Martells Mineral Site A85 & A86REP4-235] submitted at Deadline 4.	minimise or eliminate the sterilisation of permitted reserves, including alternative routes where Candidate Sites may be allocated as part of the ongoing Minerals Local Plan Review. As these discussions are ongoing, and the MWPA have not been provided with any finalised alternative route options, ECC cannot yet take a final view on potential impacts on the deliverability of existing allocations or Candidate Sites. As a result, this matter must remain Under Discussion.	
Other matters as required				

3.6 Health and Wellbeing

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

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 10.2 of **6.10 Environmental Statement Chapter 10 - Health and**	**May 2026** Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses **[REP2-023, REP2-030 and REP2-029]**, this issue can be moved to agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		WellbeingAPP-192]. Key regional and local policy relevant to health and wellbeing has informed the Health and Wellbeing assessment found **6.10 Environmental Statement Chapter 10 - Health and Wellbeing APP-192]**. This includes the Joint Strategic Needs Assessments (JSNAs) and health and wellbeing strategies prepared by local authorities to identify local health priorities. The Essex Joint Health and Wellbeing Strategy is amongst those listed in Table 10.1 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. Health priorities common across local health and wellbeing strategies reviewed include tackling health inequalities, supporting mental wellbeing and enabling healthier, more active communities, as demonstrated in Table 10.1 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**.		
EIA – Approach and Methods				
3.6.2	Study area	The study area was agreed through the **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October	Health and Wellbeing Chapter: An additional technical note for health and wellbeing (November 2024) refreshed approach has been produced and should be referenced here. Clarification is required on use of 'Indices of	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		2024. ECC response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025.National Grid can confirm that the baseline section of the ES chapter includes reference to the Index of Multiple Deprivation (IMD). The approach to defining ward sensitivity has used a variety of baseline data, including the IMD but also other health-related indicators. National Grid can confirm that published local position statements such as the Essex Joint Health and Wellbeing Strategy have been included within **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**.	Deprivation', will this look at the overall measure of deprivation along the route or will it focus domains of deprivation as part of defining sensitivity. ECC confirmed in an email dated 30 January 2026 from the public health team that this matter has been resolved and the position can be agreed.	
3.6.4	Assessment methodology	A meeting was held on 24 September 2024 to agree the assessment methodology of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192].** Comments were received on the Technical Note from ECC on 01/11/2024 and a response was provided in May 2025. Comments made by ECC in their relevant representation are noted, and National Grid will continue to engage with ECC on this matter. National Grid's position to each of the points raised is as follows: • A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project	As part of the Statutory Consultation, ECC Public Health highlighted the need for a more robust health impact assessment and the need for National Grid to focus on actively driving out maximum local benefits to the health and wellbeing of communities across Essex. Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses [**REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. • **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]** contains an assessment of impacts on vulnerable groups. Vulnerable groups considered in the assessment are identified in Table 10.5 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. National Grid provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023]** and in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**.		
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. The key parameters and assumptions presented are considered appropriate. National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024. ECC response to the technical note was received	Key parameters presented in the PEIR are considered appropriate at a population level, consideration of vulnerable groups and the application of a precautionary principle. As with the revised health and wellbeing approach, use of the Welsh Health Impact Assessment Support Unit (WHIASU) guidance is recommended to inform the identification of vulnerable population groups is recommended. The refreshed approach to Health and	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		in November 2024. National Grid responded to ECC's comments on the technical note in May 2025. ECC comments are noted, and NG will continue to engage with ECC on this matter. In relation to the points raised in ECC's relevant representation dated 27 November 2025: • The assessment undertaken in **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]** reported the available IMD data at the time (i.e. 2019) in order to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. We have also reviewed deprivation data for the health deprivation and disability domain at LSOA level, as set out in paragraph 10.5.18 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. A review of the updated IMD data published in October 2025 (after the DCO application was submitted) shows that, for Greater Essex, more people are living in deprived areas in 2025 than was the case in 2019 (although for some areas such as Colchester, deprivation levels do not appear to have changed significantly over the same time period). It is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment; impacts on vulnerable populations (which includes people both within and outside of	Wellbeing should be referenced here. ECC provided the following details in their relevant representation dated 27 November 2025: • The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently. **May 2026** ECC notes National Grid's acknowledgment that the 2025 IMD update shows that for Greater Essex, more people are living in deprived areas in 2025 than in 2019 . A meeting held with the Applicant on 23.04.2026 confirmed a supplementary section of the ES is to be provided for further review	

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		deprived areas) have already been taken into account in the assessment. • The Applicant submitted **Document: 8.16 Health and Wellbeing and Socio-Economics Recreation and Tourism Technical NoteREP4-317]** which reviewed the findings of IMD 2025 against 2019 IMD and used LSOA level data to understand whether there has been any changes in localised deprivation over time. **Document: 8.16 Health and Wellbeing and Socio-Economics Recreation and Tourism Technical NoteREP4-317]** presented the summary assessment of the implications of the new data for **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]** and **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. Both chapters will be updated with the new information at Deadline 6. This is in response to the ExA rule 17 letter. • It is recommended that these issues are identified as Agreed.	June 2026 This is currently being reviewed.	
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. The baseline conditions and receptors presented are considered appropriate.	Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		ECC comments are noted, and NG will continue to engage with ECC on this matter. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to IMD data has been addressed earlier in relation to ID 3.6.5 and is not repeated here. • The point relating to the Joint Health and Wellbeing Strategy has been addressed earlier in relation to ID 3.6.1 and is not repeated here.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. In relation to points raised in ECC's relevant representation dated 27 November 2025: • No significant health and wellbeing impacts have been identified in the assessment set out in **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]** and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential	Embedded measures relevant to the Health and Wellbeing Chapter which are intrinsic to and build into the design of the project are considered appropriate and adequate. **May 2026** ECC acknowledges National Grid's commitment to add additional wording to the Outline CoCP. Appendix E (APP-305) requiring a detailed Communications Strategy to be put in place for the duration of the construction phase. This matter can be moved to agreed, subject to confirmation that the Communications Strategy requirement in the final CoCP will explicitly require: (a) advance notification of disruptive activities to affected communities; (b) a formal complaints handling process with defined response times and escalation routes; and (c) accessible communication options for residents	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through making timely design decisions and engaging with the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through the use of a dedicated project phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. In recognition of concerns relating to anxiety and uncertainty about the scale and duration of construction, the following additional wording will be added to **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public InformationREP4-168]**: • The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice.	experiencing digital exclusion (paper copies, community notice boards).	
3.6.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of **6.10 Environmental Statement**	**May 2026** ECC note that standard mitigation for health and wellbeing relies on commitments	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Chapter 10 - Health and WellbeingAPP-192] and set out in **7.2 Outline Code of Construction PracticeREP4-164]** . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to health and wellbeing monitoring has been addressed earlier in relation to ID3.6.7 and is not repeated here. A number of the measures requested by ECC have already been included in the submission documents. Examples include good practice relating to dust suppression as set out in **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management PlanREP4-166]**. **6.7 Environmental Statement Chapter 7 – Air QualityAPP-147]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment ResultsAPP-150]** conclude that with appropriate application of dust mitigation there would likely be no significant effect to human health from construction dust. **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** includes the assessment of the potential impacts of the Project including changes in traffic flow, delays, road safety and impact on walking, cycling and horse-riding modes on the roads along the Primary Access Routes located in the Local Road Network that would access the haul roads to	distributed across multiple ES Chapters (Air Quality, Noise and Vibration, Traffic and Transport) rather than being consolidated in Chapter 10. This makes it difficult to assess whether the totality of health-protective measures is adequate. ECC has requested that the final CoCP include a dedicated section on health and wellbeing mitigation. This section should consolidate all health-relevant commitments, including noise management, dust suppression, PRoW management, and community liaison, and cross-reference monitoring framework. At a meeting held 23.04.2026, the Applicant confirmed that a dedicated health and wellbeing section will be developed bringing together key commitments from other technical chapters. This matter can be moved to agreed, upon receipt of written confirmation within the oCoCP.	

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		construction sites. **7.11 Transport AssessmentAPP-333]** examines capacity, safety and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Within the assessment of the relevant Environmental Statement chapters and the Transport Assessment, mitigation measures are proposed to minimise likely adverse impacts. The Applicant will provide ECC with a document signposting to the relevant sections of the Applicant's documents to assist ECC with reviewing.		
3.6.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. ECC comments are noted, and NG will continue to engage with ECC on this matter. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to IMD data has been addressed earlier in relation to ID 3.6.7 and is not repeated here.	**May 2026** The point relating to mitigation is addressed above 3.6.8	Under Discussion
EIA – Assessment Conclusions				
3.6.10 a	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]**. The assessment of effects during construction presented is considered	It is noted that mental health and wellbeing may also be impacted by residents experiencing anxiety in relation to air quality effects. However, with the mitigation measures identified, the residual effects of the Project in	Agreed

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		appropriate.	relation to Health and Wellbeing for both the general population and for vulnerable groups is considered to be neutral and not significant. This will need to be informed by the refreshed approach to health and wellbeing assessment in the revised technical note. It is also noted that mental health and wellbeing may be impacted in relation to effects on visual amenity during construction. However, effects are considered to be temporary, and the location of impacted population would change throughout the construction period due to the linear nature of the Project. Relevant mitigation includes community liaison measures to inform residents of construction activities. As noted in the revised health and wellbeing technical note, the effects would need to assess sensitivity of receptors across the linear project, magnitude of effect in relation to mental health and wellbeing. This should also include qualitative assessment of the anticipated mental health and wellbeing impacts as noted within the revised approach and should provide the opportunity to input qualitative information to co-produce mitigation measures to offset the anticipated mental health impacts from the project which is one of the listed protective factors within the assessment "facilitating participation". It is noted preliminary residual effects of the Project in relation to Health and Wellbeing is potentially negative during construction due to	

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			changes in travel choice and potential effects on journey times and distances in particular for those accessing healthcare facilities. Though considered to be not significant, further assessment and mitigation measures should be provided in the ES according to the revised health and wellbeing assessment approach. May 2026 Following meeting held with the Applicant on 23.04.2026 and a review of the Applicants' response to ECC's RR**RR-1083]**, **LIRREP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.10 b	Construction effects	In relation to points raised in ECC's relevant representation dated 27 November 2025: • **5.1 Consultation ReportAPP-066]** sets out the approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom English may be a second language. The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation (SoCC), giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and	ECC provided the following details in their relevant representation dated 27 November 2025: EN-1 emphasises the need to assess potential impacts on vulnerable groups within society. The ES baseline data acknowledges that sections of the population along the project corridor do not speak English as their main first language, yet this vulnerability has not been considered within the sensitivity assessment or mitigation planning. Communities with limited English proficiency may face barriers to understanding consultation materials, receiving construction updates, or engaging with health information - leading to heightened anxiety and exclusion from mitigation measures. ECC recommends that the Applicant adopt inclusive engagement methods, including translated	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means. Appendix E - Community Engagement and Public Information of **7.2 Outline Code of Construction PracticeREP4-164]** sets out the communications channels and approach to community engagement during the construction of the Project, including the approach to engaging with local communities.	materials, interpreters, and collaboration with local community and faith organisations. These measures would align with EN-1's requirement to take opportunities to promote local improvements to encourage health and wellbeing, especially for groups who may be differentially affected by the development. **May 2026** Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses [**REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.10 c	Construction effects	• We recognise that people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**. Paragraph 17.5.47 identifies that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality /	ECC provided the following details in their relevant representation dated 27 November 2025: • EN-1 (paragraph 4.4.5) requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Many Essex communities, particularly in Tendring, will experience overlapping NSIPs and growth schemes. The ES does not sufficiently consider the compounded psychological stress of multiple construction projects and landscape change. 32 6.8.10. ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		sense of place / uncertainty during the construction phases. • We understand that uncertainty while the Project is developed may cause anxiety. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including use of a dedicated phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. Impacts on community safety (traffic) have been assessed in **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP-192]** in relation to the potential for increases in traffic on the road network which could increase risk to users of the roads, including pedestrians and cyclists. Impacts associated with reduced active travel have been considered in relation to physical activity and the potential for disruption to PRoWs or areas of open space which may affect opportunities for physical activity. Health impacts associated with amenity loss from construction activities (noise and dust) are described in **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP-192]** paragraphs 10.7.12 to 10.7.20 and 10.7.3 to 10.7.11 respectively; health effects arising from changes in accessibility to social infrastructure are set out in paragraphs 10.7.47 to 10.7.62); health effects arising from disruption to walking and cycling routes and areas of open space during construction are	disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed **May 2026** Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		described in paragraphs 10.7.86 to 10.7.187. No significant effects have been identified for health and wellbeing in relation to these aspects.		
3.6.11 a	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192].** Chapter 10 sets out the assessment of impacts as they relate to both physical and mental health and wellbeing, noting that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would bring **6.10 Environmental Statement Chapter 10 - Health and WellbeingAPP-192]** identifies that, whilst there are likely to be individuals who experience adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. This draws on findings presented in **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]** and specifically the conclusions within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity AssessmentREP4-148, REP4-150, REP4-152, REP4-154 and REP4 156]** which finds no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live. It is noted within the Residual Visual Amenity	Health and Wellbeing Chapter: Significant negative effects on landscape character during operation (and maintenance) are predicted to extend across the draft Order Limits and the surrounding landscapes within approximately 0.5 km to 1 km of the project. Similarly, significant negative effects on views and visual amenity during operation (and maintenance) are predicted to be experienced within approximately 1 km to 2 km of the project and these are likely to be experienced by a range of visual receptors including residents, road users and recreational receptors. It is understood that response of the local communities to these aspects are subjective, and effects are likely to be experienced by a proportion of the local population due to how the Project may impact setting of homes, businesses and or culturally or ecologically important community assets. Further assessment undertaken and presented in the ES should also draw from the mental health and wellbeing assessment approach within the refreshed approach to health and wellbeing assessment technical note which will include a qualitative aspect. **May 2026** Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161**] and	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Assessment (RVAA) that some properties / property groups do come close to this threshold and that mitigation measures have been recommended to reduce effects	Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.11 b	Operational (and maintenance) effects	In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision 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 construction of the Project. The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. With regards to visual effects, the LVIA presented in **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]** identifies significant adverse residual effects on landscape	As part of the Statutory Consultation, ECC Public Health highlighted the need to consider how significant negative impacts could be off set through positive community benefits for local communities within Essex, such as funding for community energy schemes, training, and skills investment within the local area for those adversely affected by the Project particularly in areas with high levels of deprivation. There is the opportunity to push for the creation of accessible green spaces providing benefits for health and wellbeing and enhancing biodiversity and local nature recovery. **May 2026** Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most landscape and visual receptors within the study area are static, and so will experience effects across the more localised areas explained in the LVIA. For example, a recreational receptor within a certain park or street will only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the project as a whole. The total visual effects of the project as a whole will be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case landscape character areas or types). Again, they will not typically be experienced as a whole, but the total effect on landscape character can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	**7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health**	Health and Wellbeing Chapter: Note comments above for embedded, standard and additional mitigation measures which are applicable to the CoCP.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		and WellbeingAPP-192] and is appropriate for managing construction impacts from the Project. The Applicant provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023]** The Applicant has further updated **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public InformationREP4-168]** at Deadline 3 with additional wording relating to the requirement for a detailed Communications Strategy as a result of community anxiety and uncertainty about the scale and duration of construction activities.	Table 5.1 in the CoCP to include a section for construction and operation phase management phase in relation to health and wellbeing taking account of the refreshed approach to health and wellbeing assessment approach. This is currently referred to in section 5.1.11 of the outline CoCP has not been provided its own section in table 5.1. Refer to our Relevant Representation dated 27 November 2025 **[RR-1083]**. **May 2026** Matter addressed above at 3.6.8 Following a review of the Applicants' response to ECC's RR**RR-1083],** LIR**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
Other matters as required				

3.7 Historic Environment

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation (Archaeology)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 11.2 of **6.11 Environmental Statement Chapter 11 - Historic Environment AS-068]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	ECC (Archaeology) has reviewed ES Chapter 11.2 and can confirm it contains all relevant legislation, policy and guidance.	Agreed
3.7.2	Policy and legislation (Built Heritage)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 11.2 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant notes the LPA's request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance	ECC (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: **6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline ReportAPP-209]** we are able to agree this matter.	Agreed

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.7.4	Data sources (Built Heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068].** Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. **Environmental Statement Appendix 11.1 - Historic Environment Baseline ReportREP1-063, REP1- 064, REP4-125 and REP4-126]** is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.	ECC (Built Heritage) confirm that this matter is agreed.	Agreed
3.7.5	Data sources (archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068].**	ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026).	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.7.6	Data sources (archaeology) – survey data	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 InformationAS-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 results of the Phase 2 geophysics fieldwork 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 Project. Archaeological trial trenching had been completed for 89% of priority areas (approximately 3000 trenches) at the point of submission of **Supplementary Environmental InformationAS-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 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.	ECC notes the fieldwork proposed prior to application has not been completed. It is understood that the outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has been provided by the Applicant to inform an appropriate assessment of the proposed development. June 2026. It is acknowledged that the Applicant has continued to complete further geophysical and trial trench evaluation during the examination period. Further reporting has also been submitted. However not all of these areas have benefited from assessment and analysis and full reporting. ECC maintain that the evaluation fieldwork would need to be completed and full reports received to constitute sufficient survey data to assess the impact on archaeological and geoarchaeological remains within the development area.	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.7.7	Assessment methodology (Built Heritage)	The methodology for assessing Historic Environment was agreed through **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate. The Applicant position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation) above.	Email 4 Nov 2024 - Built heritage – consultant's methodology not agreed, and all assets affected not identified. ECC (Built Heritage) is in agreement with this matter.	Agreed
3.7.8	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through the **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	ECC is in agreement with this matter.	Agreed
3.7.9	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068]**. The key parameters and assumptions presented are considered appropriate. February 2025, the Applicant issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic. March 2025, the Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.	ECC (Built Heritage) is in agreement with the matter following review of the ES.	Agreed
3.7.10	Key parameters and assumptions (Archaeology)	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	ECC notes the fieldwork proposed prior to application has not been completed. It is understood that the outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		determine consent by the Planning Inspectorate and the Secretary of State. 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 QuestionsREP3-074].** The assessment presented in **6.11 Environmental Statement Chapter 11- Historic EnvironmentAPP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment TablesAPP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been 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 OrderREP4-037]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. 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**	before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has been provided by the Applicant to inform an appropriate assessment of the proposed development June 2026. It is acknowledged that the Applicant has continued to complete further geophysical and trial trench evaluation during the examination period. Further reporting has also been submitted. The key parameters and assumptions are considered appropriate for the areas of the route that have been evaluated through intrusive methods, however not all of these areas have benefited from assessment and analysis and full reporting. The AMS-OWSI provides details on how this will be addressed post consent. At present the AMS-OWSI is not agreed and it is essential to have agreement on this control document to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. We will continue to work with the Applicant to reach agreement on the AMS-OWSI	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Environmental Statement Chapter 11 - Historic EnvironmentAS-068] to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary ResultsAS-083]**, of which the historic environment stakeholders are aware. Further details can be found in response to ID 4.13.25 in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**.		
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 EnvironmentAS-068]**. The baseline conditions and receptors presented are considered appropriate February 2025, The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic. Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).	ECC (Built Heritage) is in agreement with this matter.	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 EnvironmentAS-068]**. The baseline conditions and receptors presented are considered appropriate. February 2025, The Applicant issued a draft Historic Baseline Report including Annex C and	ECC agreed this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Annex D for agreement/comment and held a meeting on the topic.		
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 EnvironmentAS-068]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. 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. 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 InvestigationAPP-328]** and will be submitted at Deadline 5. The evaluation of the 400 kV 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.	ECC (Archaeology) agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is most relevant in areas of underground cable where there will be an impact on archaeological remains. Further time is needed to review **5.15 Design Development ReportAPP-122]** but we note this refers only to changes requested to the route alignment which were made before the final ES. As a result, and noting the intrusive archaeological fieldwork proposed prior to application is unlikely to be completed, before the end of the examination, ECC cannot agree that sufficient archaeological survey data will have been provided by the Applicant to inform an appropriate assessment of the proposed development. (June 2026)While it is acknowledged that further evaluation, including geophysics and trial trench evaluation, has been completed and further reporting has been received there remains areas of the project where the embedded mitigation is not sufficient to	Under discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			determine the impact on significant archaeological and geoarchaeological remains along the route, specifically within the Stour Valley and relating to the undergrounding across the river. Until full archaeological and geoarchaeological evaluation are completed in these areas and full reports produced it is not possible to determine if embedded mitigation has been successful in avoiding or reducing significant effects on the archaeological and geoarchaeological resource.	
3.7.14 a	Standard mitigation (Built Heritage)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068]** and set out in the **7.2 Outline Code of Construction PracticeREP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management PanREP3-030]**. Specifically, this means: Replacement features will be of a similar type, scale, and material to those lost, wherever	This matter is agreed with regards to commitment H06.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		possible, reflecting the character and function of the original feature 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 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 If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.		
3.7.14 b	Standard mitigation (Built Heritage)	Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and VibrationAPP-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 of **7.2 Outline Code of Construction PracticeREP4-164]** is considered to be appropriate. 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**	Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) ECC would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Responses to First Written QuestionsREP3-074] and **8.17 Response to Rule 17 Letter - Historic EnvironmentREP4-318].** As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public InformationREP4-168]** a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. In addition, **7.2 Outline Code of Construction PracticeREP4-164]**, commitment GG30 includes: "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." The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
3.7.15	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement**	ECC (Archaeology) agreed this matter during call held January 2026.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Chapter 11- Historic EnvironmentAS-068] and set out in the **7.2 Outline Code of Construction PracticeREP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.7.16	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment AS-068]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. . 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 InvestigationAPP-328]** and will be submitted at Deadline 5.	The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation. ECC noted during call in January 2026 that this matter is not relevant for Built Heritage. This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** which is scheduled for submission at Deadline 5 June 2026. The revised AMS-OWSI has been received. Comments have been provided direct to the Consultant. At present the revised AMS-OWSI is not agreed and it is essential to have agreement on this control document to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. We will continue to work with the Applicant to reach agreement on the AMS-OWSI	Under Discussion
EIA – Assessment Conclusions				

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.7.17	Construction effects (Built Heritage)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068]**. The assessment of effects during construction presented is considered appropriate.	ECC (Built Heritage) are in agreement with this matter.	Agreed
3.7.18	Construction effects (archaeology)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068]**. The assessment of effects during construction presented is considered appropriate.	This section is currently under review (ECC Archaeology) Email 4 Nov 2024 - Archaeology – consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. Email 6 Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, ECC (Archaeology) confirmed agreement on this matter during call in January 2026.	Agreed
3.7.19	Operational (and maintenance) effects (Built Heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	This matter is agreed for Tendring, Braintree, Brentwood, Basildon and Colchester.	Agreed
3.7.20	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic EnvironmentAS-068].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.21	Outline CoCP	The **7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11-Historic EnvironmentAS-068]** and is appropriate for managing construction impacts from the Project. See 3.6.14 and 3.6.15 for current position. Commitment H06 in **7.2 Outline Code of Construction Practice REP4-164]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed.	It is noted that Commitment H06 in **7.2 Outline Code of Construction Practice REP3-025**] has been updated to reflect wording requested by ECC. ECC can confirm this issue is now agreed	Agreed
3.7.22	Environmental Actions and Commitments	Section 9.8 of **7.4 Outline Landscape and Ecological Management PlanREP3-030]** already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in **7.2 Outline Code of Construction PracticeREP4-164]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed.	In light of the changes made to the oCOCP in line with wording suggested by ECC, this can now be moved to agreed	Agreed
Other matters as required				
3.7.23	Overarching Written Scheme	The Applicant shared overarching WSIs in March – June 2024 and December 2024.	The scope and methodology of the overarching WSI for pre-consent geophysical	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
	of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	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.	surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	
3.7.24	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. There are still addenda to site specific WSIs forthcoming that have yet to be issued.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.25	Outline Archaeological Mitigation Strategy and Outline WSI.	The contents of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** is considered appropriate and proportionate to the level of evaluation required. The Applicant issued the draft Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) for the post-consent stage of the project in April 2025. 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 InvestigationAPP-328]** and will be submitted at Deadline 5.	The Outline AMS-WSI is currently not agreed, This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** which is scheduled for submission at Deadline 5 June 2026. The updated version of the AMS-OWSI has been reviewed (May 2026) and is not yet considered sufficient as a control document. Comments have been provided direct to the Applicant and these changes would be required prior to the determination of the application.	Under Discussion

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

3.8 Hydrology, Land Drainage and Flood Risk

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 9.2 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including storage calculations) was submitted to the examination in the form of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. In paragraph 2.3.2 of **7.9 Flood Risk AssessmentAPP-331]** the Applicant confirms that, the allowance applied within the surface water drainage designs, is for a 45% uplift in	On going discussions - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 **[RR-1083]**. ECC provided the following details in their relevant representations dated 27 November 2025: • For surface runoff disposal during construction and from built areas (offices, storage compounds), this will need to be designed in accordance with 'The Sustainable Drainage Systems Design Guide for Essex 2020' and should capture / control all surface water discharge. Unrestricted runoff from the site into any open water body or sewer is not considered acceptable. • ECC provided initial comments on the revised **Drainage StrategyREP1-072]** at Deadline 3. ECC would refer to comments	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		peak rainfall for climate change. This is in line with ECC requirements. The Applicant will continue to engage with ECC on this matter. **May 2026** The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**	raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
EIA – Approach and Methods				
3.8.2	Study area	The study area was agreed through the **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.8.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221].** Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and was submitted to the examination in the form of	With reference to **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**, the listed data sources are accepted. With regard to surface water management, it is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. There are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		8.2 Drainage StrategyREP4-186]. This was submitted at Deadline 1. With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice REP4-164]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**	North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding – ECC advises that reference should be made to the ECC Culvert Policy. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
3.8.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** Opinion received from the Planning Inspectorate. The Applicant shared technical notes for the following: • Works In, Over and Under Watercourses	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. It was also noted in the Statutory Consultation that ECC does not raise any principal areas of disagreement with National Grid on this topic.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. The key parameters and assumptions presented are considered appropriate. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**	ECC welcomes further discussion on these issues. As set out in ECC's **LIRREP1-161] where a n**umber of points were made in respect of the submitted FRA**APP-331],** the LLFA requests further clarity on the location of permanent and temporary construction works especially given the limits of deviation, but all works will require appropriate flood mitigation and surface runoff management, to ensure any excess runoff from drainage systems does not impact the surrounding area. This detail is still outstanding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	Under Discussion
EIA – Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. The baseline conditions and receptors presented are considered appropriate. With regard to the culvert at the proposed Tilbury North Substation please see response at ID 3.8.3. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an	It is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**	peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination in the form of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice REP4-164]**, secures that the detail of the designs to maintain existing overland	ECC acknowledges that many of its initial issues have been resolved. However, further clarity is required on the surface water runoff from construction sites, haul roads and operational assets and the SuDs techniques proposed to mitigate runoff. It is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant will continue to engage with ECC on this matter. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**	to unacceptable surface water run-off and flooding ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
3.8.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]** and set out in the **Outline Code of Construction PracticeREP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023].**	ECC acknowledges that many of its initial issues have been resolved. Clarification about proposals for surface water management and storage calculations/requirements, is required. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		May 2026 The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on**REP1-072].**		
3.8.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**.	ECC acknowledges that many of its initial issues have been resolved. However clarity is required on whether this point is referring to construction or operation of the scheme as different measures may be required. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	Under Discussion
EIA – Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]**. The assessment of effects during construction presented is considered appropriate.	ECC acknowledges that many of its initial issues have been resolved. However, further clarity on the Applicants proposals for surface water management and storage calculations/requirements, is required The detail provided is appears acceptable for construction phase but would highlight	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) was submitted to the examination in the form of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**.	comment raised in its Relevant Representation dated 27 November 2025 **[RR-1083]** that in accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221].** The assessment of effects during operation (and maintenance) presented is considered appropriate. Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination in the form of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1.	ECC acknowledges that many of its initial issues have been resolved. However, further clarity on the Applicants proposals for surface water management and storage calculations/requirements is required. is Although it is acknowledged that the Drainage strategy does provide discharge rates for features, there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice REP4-164]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**.	been provided. While the commitment W08 within **7.2 Outline Code of Construction PracticeAPP-300 REP3-025]** is noted, it is impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP (including Flood Warning and Evacuation Plan)	The **Outline Code of Construction PracticeREP4-164]** includes all relevant construction mitigation measures specified in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood RiskAPP-221]** and is appropriate for managing construction impacts from the Project. Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination	On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. The detail provided is acceptable for the construction phase but ECC would refer to comments raised in its Relevant	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		in the form of **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**.	Representation dated 27 November 2025 **[RR-1083]** ECC provided the following details in their relevant representations dated 27 November 2025: • In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	
Other matters as required				
3.8.13	Flood Risk Assessment (FRA)	The draft FRA was issued to stakeholders in January and March 2025. The scope, methodology, assessment and conclusions drawn in the FRA are considered appropriate and proportionate. Building on the information provided in Appendix C of **7.9 Flood Risk AssessmentAPP-331]** further details regarding proposals for surface water management (including specified discharge	Discussions have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 **[RR-1083]**	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		rates/limits and clarifications with regards to drainage design standards) were submitted **8.2 Drainage StrategyREP4-186] at Deadli**ne 1. The Applicant will engage with the LLFA to discuss and resolve the comments provided on **8.2 Drainage StrategyREP4-186] with a vi**ew to submitting a revision to the document at a future deadline. With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction PracticeREP4-164]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an updated Drainage Strategy at Deadline 4**REP4-186]**, which includes specified discharge limits together with a new appendix of drainage plans, which include exceedance flow routes**REP4-188]**.	ECC provided the following details in their relevant representations dated 27 November 2025: • The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. • In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5.	

3.9 Landscape and Visual

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment. The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**. The Applicant notes that this matter can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20th May 2026.	ECC agree with the overarching policy documents stated in the Landscape and Visual assessment is presented in **Chapter 2 (Key Legislation and Planning Policy Context)APP-126]** and Section 13.2 Chapter 13 (Landscape and Visual) of the ES [APP-226].: In ECC's Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues they flagged that a Valued Landscape Assessment should form part of the Landscape and Visual Impact Assessment carried out e.g. through the final EIA. Local landscape designation no longer forms part of promoted government policy and therefore local value generally needs to be assessed in line with 'TGN 02-21: Assessing landscape value outside national designations' Valued landscape criteria have now been included in the landscape assessment;	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			however, ECC is concerned that some of the evaluation is flawed. In addition, as the baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly affected, particularly river valleys ECC also had concerns regarding whether a preliminary judgement on significance had been determined without going through the stage of identifying susceptibility and magnitude of effects. ECC are substantially satisfied that all stages of the LVIA process have been executed although not necessarily with all aspects of the approach. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
EIA – Approach and Methods				
3.9.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. The study area was agreed through the **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate and through subsequent thematic workshops. 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	Generally ECC do not have issues with the study area, however, in relation to the visual assessment ECC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Statement of Common Ground with ECC on 20th May 2026.		
3.9.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. The request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and ViewpointsREP4-160]** 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 VisualisationsAPP-343 to APP-351, REP4-180 to REP4-182]** 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 - Visual Baseline and AssessmentAPP-229 to APP-232]** is accompanied by 1:25,000 OS mapping and aerial imagery. The Applicant suggests that the matter of data sources 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.	ECC Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified that the limited number of viewpoints and visualisations that are proposed over the length of the Project needed to be reviewed. Generally, ECC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, ECC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance. ECC also remarked that the preliminary LVIA did not appear to include details of the agreed criteria on which the assessment judgements are based Whilst all criteria have now been identified and presented in the ES, ECC retain issue with the approach to landscape value and value of the view. ECC identified a number of additional areas where they believe data quality and presentation could have been improved in order to aid access and interpretation. ECC welcome the changes made on the other issues.	Agreed
3.9.4	Assessment methodology	The assessment methodology is set out in **6.13.A1 Environmental Statement Appendix**	In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage,	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
	(including LVIA methodology)	**13.1 - Landscape and Visual MethodologyAPP-227]**. Paragraph 13.4.9 and Table A13.1.4 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual MethodologyAPP-227]** set out the approach to consideration of landscape value. The Applicant's position regarding the approach to landscape value is set out in response ID 7.5.1 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A)REP2-030]**. 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.	ECC retain concerns in a select individual areas where there remain gaps in the coverage. In relation to valued landscapes see comments from statutory consultation and response at 3.8.3 above. ECC raised concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 '*Outside nationally designated areas, there are local landscapes that may be highly valued locally'* nor how the following in *t*he current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: '*Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.'* This issue relates particularly in several river valleys along the route. ECC recognise and approved the methodology for assessing Landscape and Visual as agreed through the EIA Scoping Report and Scoping Opinion. ECC note that the Valued Landscape Assessment criteria follows the Landscape Institute guidance, 2021.	
3.9.4a	Viewpoints	The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and**	In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, ECC retain concerns in a select individual areas where there remain gaps in the coverage. Still Under Discussion. In relation to valued	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		AssessmentAPP-229 to APP-232]. Visualisations are provided in **7.12 VisualisationsAPP-343 to APP-351, REP4-180 to REP4-182]**. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4APP-229].** The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the **Statements of Common Ground (5.9.1 to 5.9.12REP4-057 to REP4-079]).** The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and ViewpointsREP1-066].** This includes viewpoints beyond 1.5 km within Chelmsford district. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in **7.12 VisualisationsAPP-343 - APP 349, REP4-180 to REP4-182].]**. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the **7.12 VisualisationsAPP-350 - APP-351, REP4-180 to REP4-182].]**. It is	landscapes see comments from statutory consultation and response at 3.9.3 above.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone.		
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. The key parameters and assumptions presented are considered appropriate.	Latest version of ES has been reviewed and ECC's position Key parameters and assumptions associated with the Landscape and Visual assessment are acceptable.	Agreed
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. The baseline conditions and receptors presented are considered appropriate. The Applicant's position regarding the approach to visual receptors and groupings is set out in response ID 7.8.2 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A)REP2-030]**.	Comments issued at Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified concerns with the Visual Receptors and Groupings have been identified based only partially on shared landscape characteristics and a similarity in the nature of views. ECC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, concerns were raised that clarity and detail may have been lost as a result. ECC retain these concerns, yet recognise the approach taken.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	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 -**	ECC identified that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing is required, particularly in river	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Project DescriptionAPP-130] and also paragraphs 13.6.2 to 13.6.4 in **Section 13.6** of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	valleys, to protect valued local landscapes, long-distant rights of way and rural amenity sites. ECC acknowledges the embedded and standard mitigation measures proposed. However, significant residual impacts remain, particularly in sensitive landscape areas. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
3.9.8	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. 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 VisualAPP-226]** and **7.2 Outline Code of ConstructionREP4-164]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Standard mitigation does not address residual significant landscape and visual impacts. Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under Discussion
3.9.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental**	Additional mitigation does not address residual significant landscape and visual impacts. Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Statement Chapter 13 - Landscape and VisualAPP-226]. The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]** and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10.	Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
3.9.9a	Compensation			
EIA – Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]**. The assessment of effects during construction presented is considered appropriate. With regard to vegetation loss, the assessment is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project DescriptionAPP-130]** and presented on **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section AREP4-029].**	E-mail 4 Nov 2024 - Landscape – Potential tree and hedgerow loss along the route has not been meaningfully quantified in landscape and visual terms in the assessment. Following a meeting held in January 2026, ECC note their position on this matter is unchanged. As ECC only had sight of NGET's Updated position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination.	Under Discussion
3.9.11	Operational (and maintenance) effects	The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual MethodologyAPP-227]** and was shared and discussed with stakeholders. The judgements were informed by detailed desk	**Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues –** ECC also flagged up that the PEIR acknowledges there will be a significant negative landscape and visual impact at both	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		and field studies, and the findings are supported by detailed explanations in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and AssessmentAPP-228]** and also **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and assessmentAPP-229 to APP-232]** and illustrative materials on **Figures 13.1 to 13.19 of the ES (6.13.F1 to 6.13.F19APP-237 to APP-255, REP4-158 to REP4-160]).** The assessment team, which includes highly experienced Chartered Members of the Landscape Institute, has thoroughly explored potential effects on landscape out to 3 km from the Project, and their findings and judgements are set out in an objective and consistent manner. It is considered that the judgements made remain fair and reasonable and that no changes need to be made.	construction and operational stages over the length of the Project. And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this. The issues above remain substantially unaddressed. Criteria for e.g. the sensitivity (susceptibility and value) and magnitude of effects, are now presented in the ES although ECC retain concerns with how some of these are defined and evaluated. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and VisualAPP-226]** and is appropriate for managing construction impacts from the Project.	Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	Under Discussion
3.9.13	Outline LEMP	**7.4 Outline Landscape and Ecology Management PlanREP3-030]** includes all relevant operational related mitigation measures specified in **6.13 Environmental**	Retain major issues particularly in relation to definition, scope and scale of term 'compensation'.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Statement Chapter 13 - Landscape and VisualAPP-226] and is appropriate.	In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from "enhanced mitigation" to "landscape compensation" require clarification to ensure these are not repurposed mitigation measures, risking double-counting. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence. ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions. Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	
3.9.14	Cumulative Effects	The cumulative effects of the Project have been assessed within **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281].** This includes an assessment of cumulative effects on landscape and visual receptors. The cumulative assessment will be updated and published at Deadline 4 to include Five Estuaries, North Falls, the Tarchon Interconnector Project and any other newly identified schemes in the area around Ardleigh and along the rest of the Project.	Concern regarding potential cumulative adverse landscape and visual effects, both at construction and long-term operational, particularly in relation to other NSIP projects such as Bramford to Twinstead, North Falls and Five Estuaries substations. In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages. The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact across the entire county, especially in the vicinity of Ardleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states: "Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area." Following a meeting held in January 2026, ECC note their position on this matter is unchanged.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Other matters as required				

3.10 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This level of employment is modest in scale and is not	ECC has reviewed the policy context, legislation and guidance presented in 6.2 Environmental Statement Chapter 2 - **Key Legislation and Planning Policy ContextAPP-126]** and Section 15.2 of 6.15 Environmental Statement Chapter 15 **- Socio-economics Recreation and TourismAPP-265].** ECC is concerned that there is no reference to its published 'Skills and Employment Principles for Major Project and Developments' document, which outlines ECC's expectations of what a Local Employment and Skills Plan should cover. It cannot therefore agree that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment and the Applicants response on this issue	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		considered significant when compared with employment demand in other sectors. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision A]**into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material 1 in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance		
EIA – Approach and Methods				

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.10.2	Study area	The **6.20 Scoping OpinionAPP-297]** stated, "The Applicant should seek to agree the study area with the relevant local authorities". A meeting was held on 12 September 2024 to seek to agree this point in the **6.20 Scoping OpinionAPP-297]**. Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity.	ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, it proposed that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.	Agreed
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. The Applicant confirms that the Employment and Skills Plan will address matters raised across the Local Impact Reports, including: • The approach to construction employment and workforce composition • Opportunities for skills development, apprenticeships and training aligned with industry standards • Engagement with education providers and skills bodies where appropriate • Principles for local and regional supply chain engagement	ECC remains of the opinion that the Applicant should provide detailed labour / workforce data as set out in **ECC's Relevant RepresentationRR-1083**] and **Local Impact ReportREP1-161]** to enable the development of targeted upskilling programmes and the timely coordination with local education and training providers, ECC is pleased to see the Applicants commitment to the preparation of an Employment and Skills Plan and would refer to its email of 21st May 2026 where it commented on the scope and content of this document. Further discussion on the draft Plan has been requested. Given the scope of the proposed Employment and Skills Plan, ECC would request that it is rebranded as the Skills, Employment and	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		• Coordination with The Great Grid Partnership's established delivery processes. The Applicant will engage with ECC on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record.	Supply Chain Plan which would be consistent with similar strategies on other projects.	
3.10.4	Assessment methodology	**6.20 Scoping OpinionAPP-297]** stated, *"The Applicant should seek to agree the study area with the relevant local authorities"* and *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".* A meeting was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion. The 3rd Technical Note was issued in March 2025 to seek agreement on the study area and methodology. The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports (AENC-NG-CNS-REP-0291)**.	ECC deems the assessment methodology ria for the Socio-economics, Recreation and Tourism assessment to be acceptable and in particular, ECC notes that where it is identified that specific businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.However, ECC would propose that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis. During their review of the Statement of Common Ground on 16 December 2025, ECC request further discussion on status of this position and to date, this remains an outstanding issue for discussion	Under Discussion
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics**	ECC having reviewed the key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment summarised in Section 15.4 of 6.15 Environmental Statement Chapter 15 -	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Recreation and TourismAPP-265]. The key parameters and assumptions presented are considered appropriate. Regional employment and skills analysis are set out in the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**, Paragraph 15.5.8 to 15.5.15. As stated above, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision A]** at Deadline 5.	Socio-economics Recreation and TourismAPP-265], has no issues to raise	
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The demographic, environmental and socio-economic characteristics of Essex have been described in Section 10.5 'Baseline Conditions' in **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP-192]** and in **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline StatisticsAPP-193**]. How vulnerable populations would be differentially affected has been summarised in Table 10.5 of **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP 192]** and in the overview of impact pathways described for each health determinant.	ECC acknowledges the information set out Section 10.5 'Baseline Conditions' in 6.10 Environmental Statement Chapter 10 – **Health and WellbeingAPP-192]** and in 6.10.A1 Environmental Statement Appendix 10.1 - **Health and Wellbeing Baseline StatisticsAPP-193].** In particular, it highlights the conclusion of the ES (APP-265) at 15.5.22, "Although there is a readily available labour force, there is also potential skills gap in the area'". ECC therefore remains of the opinion that the Applicant should provide detailed labour / workforce data as set out in Paragraphs 4.8.12 – 4.8.14 of ECC's Local Impact ReportREP1-161] to enable effective planning, coordination with local education and training providers and the	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			development of targeted upskilling programmes.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community	ECC recognises that the potential effects on community facilities, businesses, tourism, and recreational assets, have largely been considered as part of the project design and that with the exception of the impact on ARU Writtle, this is reflected in the approach to embedded mitigation. It is understood that discussions are ongoing to resolve any concerns and confirm access arrangements. Notwithstanding, ECC believe there is potential for significant (although) short term impact to businesses along the planned route, including in particular wedding venues, education facilities and equestrian centres as well as from general increase in traffic movements at key points of the network as outlined in ECC's **LIRREP1-161] to ensure** there is appropriate mitigation for these businesses. ECC also considers skills and employment should be considered separately from community benefits and secured through the DCO. While this is approach to Skills and Employment is not accepted by the Applicant, ECC is pleased to see the Applicants engagement regarding g a Skills and	**Under Discussion**

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		benefit initiatives through its existing regulatory and funding arrangements.	Employment Plan and the opportunity to discuss its scope and content further . ECC also understand the position regarding the impact on ARU Writtle remains unresolved with mitigation needing to be finalised between the parties. The concern is highlighted at paragraphs 4..8.18-4.8.19xx of ECC **LIRREP1-161]**	
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]** and set out in **7.2 Outline Code of Construction PracticeREP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. As stated above, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision A]**at Deadline 5. Separate to skills, the Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. In spring 2026,	ECC acknowledges the measures proposed in GG10 and SO3 of the **Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]** (Chapter 15) with regards to minimising the effects on community facilities, businesses, tourism, and recreational assets. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		the Applicant will begin consulting on how the community benefit funding should be used. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements.	support to help them meet project requirements. In this regard, ECC highlighted in its relevant representation**RR-1083]** and again at Paragraphs 4.8.21 – 4.8.31 of ECC's **Local Impact ReportREP1-161]**, that the Applicant should actively engage with relevant partners to identify opportunities to upskill the local workforce through shared apprenticeships, traineeships, and collaborative training programmes and the Applicants comments in this regard, are welcomed. ECC is therefore pleased to see the Applicants engagement on a draft Skills and Employment Plan and welcomes further discussion on the comments made its comments on its scope and content ECC is of the opinion that measures to enhance skills and employment opportunities should be secured through the DCO via a legal agreement rather than considered part of the proposed approach to community benefits.	
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The additional mitigation identified in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]**. is considered appropriate in terms of its nature and scale, to address potential effects. ECC maintains however, that there is a need for a Skills and Employment Plan consistent	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		As stated above, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision A]**at Deadline 5. Separate to skills, the Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance. The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements.	with ECC NSIP policy which is covered in Section 3.10.8	
EIA – Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265].** The assessment of effects during construction presented is considered appropriate.	ECC is concerned that the Norwich to Tilbury project during could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy,	Not agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant has submitted **8.13 Outline Employment and Skills PlanRevision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent OrderRevision E]**. **6.15 ES Chapter 15 Socio-Economics, Recreation and TourismAPP-265)]** does not identify any relevant significant adverse effects of the Project arising from its construction, operation or decommissioning on socio-economic, recreation and tourism receptors. As such, Employment and Skills Plan is not required as mitigation, but is intended to maximise socio-economic benefits arising from the Project. On this basis, the use of a DCO requirement is considered appropriate and proportionate, and a separate legal agreement is not considered necessary. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of **8.8.2**	including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with appropriate funding through a Section 106 agreement which would respond to concerns raised**ECC LIR REP1-161]** regarding the absence of a consolidated document at application stage while also providing greater transparency on the approach to these matters. ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. This should include: • Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Applicant's Comments on Local Impact ReportsREP2-030].	• Commitments to local job creation and use of local contractors where feasible • Evidence-based interventions informed by community engagement and local labour market data • A sustainability and legacy framework to ensure initiatives continue from construction through to operation In addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery. While engagement with Host Planning Authorities on the scope of the Plan is welcomed, this does not in itself provide the necessary assurance that agreed outcomes will be secured over the lifetime of the Project. ECC therefore considers that local authority approval should remain a requirement, consistent with national policy, to ensure accountability and the delivery of meaningful employment, skills and supply chain benefits for local communities.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Move to Not Agreed based on the approach to the Skills and Employment plan being proposed which is not for LPA approval and is being linked to the Community Benefit Fund	
3.10.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	ECC recognises the residual effects outlined in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265**] linked to the operation and maintenance of the development once completed. Based on the assessment and measures set out in paragraphs 1.7.32 – 15.7.40 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265],** it is considered this matter can be agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	**7.2 Outline Code of Construction Practice REP4-164]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]** and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the **7.2 Outline Code of Construction PracticeREP4-164].**	From the perspective of socioeconomics , recreation and tourism, the OCoCP is considered acceptable.	Agreed

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		Meeting held in March 2025 to discuss the second iteration of **7.2 Outline Code of Construction PracticeREP4-164]**. A further iteration of **7.2 Outline Code of Construction PracticeREP4-164]** was issued in May 2025 following the meeting and feedback in writing.		
Other matters as required				
3.10.13	Skills and Training	Regional employment and skills analysis are set out in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and TourismAPP-265]** Paragraph 15.5.8 to 15.5.15. The Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary, or proportionate in the context of this Project. In response, and to elaborate on what the Applicant said in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision 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	As submitted, the application contained no reference to an employment and skills strategy. As a result, there is no clarity on what the Applicant is doing for training and skills. In addition, there is a lack of reference to data on employment and skills, leading to a request that a regional skills analysis is undertaken. ECC therefore now welcomes the Applicant's commitment to engage with the Council on a Skills, Employment and Supply Chain Strategy which responds to concerns raised**ECC LIR REP1-161]** regarding the absence of a consolidated document at application stage and provides greater transparency on the approach to these matters. ECC believes however that this should a document which is subject to the approval of the Council through the DCO. ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		chain engagement during construction of the Project.	comprehensive Employment and Skills Strategy that includes: • Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes • Commitments to local job creation and use of local contractors where feasible • Evidence-based interventions informed by community engagement and local labour market data • A sustainability and legacy framework to ensure initiatives continue from construction through to operation To support this, ECC strongly recommends the establishment of a dedicated Employment and Skills Fund. This fund should be proportionate to the scale and impact of the development and used to • Invest in local further education facilities and provision • Support employment and skills programmes • Enhance careers education and school engagement • Fund ECC officer resource for consultation and monitoring of the employment and skills strategy. In addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery. ECC would also take the opportunity to suggest that skills should be considered separately from community benefits.	
3.10.14	Cumulative Effects	Inter-project cumulative effects are set out in **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**. The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. The Applicant is committed to supporting skills development and workforce planning at both	ECC is concerned that the Norwich to Tilbury project could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement. In this regard, it is noted that community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through the DCO, consistent with the principles set out in the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025). The Applicant will continue to engage with ECC on this matter.	support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with appropriate funding through a Section 106 agreement. ECC considers that 480 jobs is significant whatever the size of the project and that both in the short term and long term, opportunities for local employment and training as well as opportunities for local business to access the supply chain should be captured through the project especially as it remains ECC's opinion that the Project will have an impact during the construction phase on local business due to impact on key routes and junctions**ECC LIR REP1-161]**. It is therefore requested that skills should be considered separately from community benefits. ECC welcomes the Applicant's commitment to engage with the Council on a Employment, Skills and Supply Chain Plan which responds to concerns raised**ECC LIR REP1-161]** regarding the absence of a consolidated ECC believes however that this should a document which is subject to the approval of the Council through the DCO.	

3.11 Traffic and Transport

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.11.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 16.2 of **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed	Agreed
EIA – Approach and Methods				
3.11.2	Study Area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed	Agreed
3.11.3	Data sources	Traffic data and modelling files have been provided to ECC for review. Updated modelling has been undertaken at junctions where ECC raised concerns that baseline scenario models presented in **7.11 Transport AssessmentAPP-333]** did not appear to accurately reflect baseline operation as expected, or where future baseline highway layouts are going to be changed as a result of	A Technical Note was received on 23rd April 2026 relating to traffic modelling. ECC to review and respond to Applicant	Under Discussion

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		improvements provided by other developments. The modelling and traffic flows for these will be provided to ECC for review and a meeting is to be arranged to discuss all findings.		
3.11.4	Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Previous concerns around using 2019 DfT data rather than more recent data have been dealt where 2023 DfT data is presented.	Agreed
3.11.5	Key parameters and assumptions	The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management PlanREP4-174].** The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP).	A Technical Note was received on 23rd April 2026 relating to traffic modelling which we understand includes a review of committed development at relevant junctions. ECC to review and provide comment to Applicant Not all traffic assumptions have been accepted as they relate to agreement on monitoring, management and mitigation to ensure the assumptions are retained – in particular: • Workers arrive/depart outside of the local highway peak hours including during the autumn/winter months when there is potential for reducing working days due to weather and lighting conditions • Car occupancy rates of the workforce and mode share In ECC's response to ExQ1 **[REP3-078]** the following wording was provided to deal with the above assumptions on workers arrival/departure times: • To update paragraph 5.4.17 of the CTMP with: "The construction and construction	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contactor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.	workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed." • To update Section 2.3 Working Hours to include the following: – Staff working hours will be <INSERT> – Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs • Table 6.1 at "Monitoring of vehicles and road network" to include: – Monitoring vehicle movements of HGVs and construction workers. • ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and / or community members. We provided some suggestions as follows: – extending the programme of works to reduce the impact of traffic; – warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site; and	

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			further disciplinary actions as necessary for repeated incidents – closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or – implementing additional shuttle buses to reduce worker traffic. • Update to the list of non-compliance at Section 6.4.1 as follows: – Construction traffic (including workers) operating outside the agreed hours • The list of non-compliance at Section 6.4.1 to include: – Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES In the response to the applicant's comments to ECC's LIR we included the following points relevant to the CTWP on car occupancy rates and mode share: • ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2). • ECC does not see why the baseline and future targets could not be set now in the	

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			CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP. • ECC requested that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network. • ECC require the CTWP (APP-311) to include a commitment to the use of a crew vehicle for the overhead line workers travelling from compound to sites. • The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site.	
3.11.6	Key parameters and assumptions	Within **6.16 Environmental Statement Chapter 16 Traffic and TransportAPP-271]** the assessment looked at the increase to future baseline traffic as a result of the Project in combination with committed developments along the PARs. At crossover points, construction traffic will 'give way' to the public highway traffic. At locations where temporary	• Road crossings have not been assessed in the ES on the basis that there is no increase in baseline traffic along the local road. However, there will be impacts as a result of an increase in baseline traffic crossing the local road in terms of safety. ECC would expect this to be managed/agreed through the design	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway. Further details can be found within the **7.3 Outline Construction Traffic Management PlanREP4-174]**. Preliminary designs of the haul road crossover points have been designed in accordance with relevant highways standards and a Stage 1 Road Safety Audit undertaken to assess road safety of all road users at these locations.	process of the crossover and a commitment included in the CTMP – for example our request to include throttling of vehicle movements. The Applicant has not addressed the above point to date. ECC inadvertently neglected to include wording for the above in ECC's response to ExQ1 **[REP3-078]** on the CTMP. ECC would request the following is considered by the Applicant and included in the CTMP. Suggested wording in italics as follows: Update to Paragraph 5.5.10: • At crossover points, construction traffic will 'give way' to the public highway traffic. At locations where temporary traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway. *Throttling of vehicle movements over the public highway should be considered as part of the design process to reduce complacency of drivers using the haul road and improve overall road safety.*	
3.11.7	Key parameters and assumptions	**Highway junctions/links** - The Applicant has and will continue to engage with Essex County Council on the junction modelling and proposed mitigation. **Routes with nearby schools** – schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and TransportAPP-271]**. Where	Some parameters have not been accepted as follows: • HGV arrivals/departures during the peak hours on some routes where there is sensitivity (specific highway junctions/links (to be agreed) and routes with nearby schools (to be agreed)	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		schools are directly located adjacent to a construction route, e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management PlanREP4-174]**. This included a review of all proposed schools identified during the review of committed developments. This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. A review of other existing schools where Essex County Council has raised concerns has been carried out. From our review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as detailed below: 1. Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-	In response to ExQ1 **[REP3-078]** ECC set out the following wording to be updated in the CTMP which deals with the above: • Paragraph 2.3.5 to be updated and moved to below 2.3.7 (under Heavy Goods Vehicle Timings) – updated wording shown in italics: – The Contractor(s) commits to restricting HGV movements during school drop off/pick up times on PARs where there is school related activity for the following locations:lQuilters Infant & Junior School, Billericay, A129 and A176lBillericay School (secondary), A129 and A176 ○ Cressing Primary School, B1018, Tye Green ○ Maltings Academy (secondary) and Powers Hall Academy (primary), Spinks Lane/Spa Road, Wickham ○ Margaretting Church of England Primary School, B1002, Margaretting – A further review will be undertaken and agreed with the LHA prior to construction to consider restrictions on routes where any new schools have been built.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic 2. Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic 3. Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic 4. Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing.		
3.11.8	Key parameters and assumptions	Collision clusters have been assessed using the criteria presented within the **6.19 Scoping ReportAPP-296]** and presented at Thematic Group and Regional meetings. National Grid would welcome a review of the collision clusters with ECC and will engage further on this matter.	Collision clusters have been determined by ECC and a–r list of road safety schemes included in the LIR have been discussed with the Applicant. ECC to provide more background to the schemes including costs for the Applicant to consider.	Under Discussion
3.11.9	Key parameters and assumptions	As defined in the **6.19 Scoping ReportAPP-296]**, the assessment criteria and magnitude of parking impact is based on the number of spaces lost for any period over four weeks.	ECC have requested parking surveys in relation to the parking suspensions to support the assumptions set out in the ES. This was	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The assessment in the Environmental Statement indicates that the suspension of parking is expected only during arrival/departure of AIL vehicles and is therefore short-term (significance of effect has been established as not significant). A case-by-case assessment of parking impacts was undertaken and is reported in Table A16.4.7: Significance of Effect Parking and Loading within **6.16.A4 ES Appendix 16.4 – Traffic and Transport Construction Effects (APP-275)**. Given the duration of the impact and the type of parking affected (e.g. informal kerbside parking), parking surveys were not deemed necessary. National Grid considers that parking surveys would not materially affect the assessment findings, and the resulting impact of the parking suspension.	identified in ECC's Local Impact Report **[REP1-161]** at paragraph 4.5.104. The impacts set out in Table A16.4.7 (6.16.A4 ES Appendix 16.4 – Traffic and Transport Construction Effects - APP-275).are based on subjective professional judgement. The basis of the level of significance includes a threshold criteria that has not been agreed with ECC. Loss of parking over even short periods of time has the potential to impact on local residents and lead to inappropriate parking practices to the detriment of highway safety. It is noted in the table that the review takes account of local circumstances. However, it is unclear whether the review included observations at specific times of day when on street parking is at its busiest for the mix of uses in that area? – for example during the day where there is a mix of uses (weekday and/or weekends depending on land uses nearby) and overnight for maximum residential demand. We continue to require parking surveys to support the assumptions in the ES.	
3.11.10	Key parameters and assumptions	Schools in Essex were considered in the **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271].** Where schools are directly located adjacent to a construction route e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the Outline CTMP**REP4-174]**. This mitigation was considered appropriate to avoid the risk of direct interaction between	• As discussed in 3.11.7 above, ECC require timing restrictions on HGV routes during school drop off/pick up in the locations identified. The Applicant has included restriction on construction traffic to avoid the pick up and drop off times of the school in Margaretting only. • ECC note the Applicant has provided justification for limiting the restrictions on	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		construction HGVs and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked or waiting outside the school.	PARs in their document 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 (p54) **[REP3-070]**. This is based on a review of infrastructure. However, ECC have stated that observations to understand patterns of movement and behaviour should be undertaken to fully understand the risks as set out in ECC's Response in document REP3-077. • The following additional points are noted by ECC: – It can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to the school drop off/pick up times. – Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR)	
3.11.11	Key parameters and assumptions	The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in	Table 16.5 sets out assessment criteria based on thresholds that are defined in the IEMA	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment of Traffic and Movement (2023). This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions.	Guidelines. However, the guidance is clear that these should be viewed as a starting point and used cautiously in any assessment, and that full regard should be given to specific local conditions with a level of judgement required to determine effects. In response to the Applicants comments on ECC's LIR submitted at Deadline 3 (p21 relating to reference 4.5.85) **[REP3-077]**, ECC set out how there are sections of the PARs that have narrow existing effective footway widths due to dirt/debris overspill that have not been referenced in Tables A16.4.5 and A16.4.6. ECC suggested that the specific PARs that require mitigation in the form of "siding out" to removed the debris/dirt/mud overspill are agreed and for this to be included in the CTMP as an update. However, ECC have also discussed whether the extent of works could be agreed through the Road Safety Review mechanism whereby the PARs are driven to pick up any issues to be rectified prior to works commencing.	
3.11.12	Key parameters and assumptions	The Applicant has developed the **7.3 Outline Construction Traffic Management PlanREP4-174]** to monitor, mitigate and manage the impacts around construction traffic. National Grid is committed to monitoring and managing the Project's impact on the road network; Section 6 of the Outline CTMP sets out the robust procedures that are anticipated to be undertaken to monitor and manage compliance with the Outline CTMP during	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant. While discussions continue, ECC highlights that the highways mitigation has not yet been agreed.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		construction. This includes detail of the Non-Compliance Procedure in Section 6.3. Instances of non-compliance will be investigated to identify corrective actions where necessary. Section 6 also sets out that the Main Works Contractor(s) will be expected to use a monitoring and reporting system to monitor the number of construction vehicles using the PARs between the sites and the SRN/MRN. The Applicant will continue discussions with ECC to agree monitoring, management and mitigation.	Refer to points raised on the CWTP in ECC's **LIR [REP1-161]** ECC welcome further discussion on this point	
EIA – Baseline Conditions				
3.11.13	Baseline conditions and receptors	**6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. A review of the list of committed developments to be considered provided by Essex County Council on 27th August 2025 (post DCO submission) has been undertaken. The Applicant has also been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs that should be considered. Where this review identifies the potential for new or different	A Technical Note was received on 23rd April 2026 relating to traffic modelling which we understand includes a review of committed development at relevant junctions. ECC to reviewand provide comment to the Applicant ECC would refer to 3.11.7 and 3.11.10 for its response and concerns regarding the impact on school receptors. With regard to environmental impacts on the PARS, ECC awaits the outcome of the Applicants review but welcomes the opportunity to continue the discussion on necessary extent of mitigation	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination at Deadline 4. Schools in Essex were considered within **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271].** Where schools are directly located adjacent to a construction route e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management PlanREP4-174].** This mitigation was considered appropriate as there may be potential risk of direct interaction between construction HGVs and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** undertook a review of all Primary Access Routes (PARs) to assess pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. This included locations where PRoWs connected to the PAR. Where required, additional mitigation has been proposed within the **7.3 Outline Construction Traffic Management PlanREP4-174]** Tables 5.6, 5.7 and 5.8. This includes:		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		• Providing construction vehicle drivers with an information pack which will provide details on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway. • Ensuring adjacent vegetation is maintained to keep verges clear. • Placing warning signs. **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. The Applicant is currently reviewing all PARs within Essex to understand whether further mitigation is required. In addition a review of the latest three year personal injury data post COVID is being undertaken to identify any new collision clusters. The Applicant will discuss the outcome of this review with Essex County Council.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.11.14	Embedded mitigation	The methodology for assessing Traffic and Transport was outlined through the **6.19**	This point on methodology referred to here can be agreed	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Scoping ReportAPP-296] and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate which stated that PARs should be assessed within **the 6.16 Environmental Statement Chapter 16: Traffic and TransportAPP-275].** The comment referring to diversion routes and road closures is covered in Item 3.11.72 below.		
3.11.15	Embedded mitigation	The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management PlanREP4-174]**.	Further discussion on monitoring commitments and requirements in CTMP. The transport assessments assume that construction workers will travel to/from the site outside of the highway network peak hours. ECC's concerns about this are far reaching and include whether this will be adhered to during the autumn/winter seasons with the prevailing weather and reduced daylight hours, and how this would be monitored and managed. Further detail is needed in the CTMP to show how the construction work would operate (shift patterns etc) within these defined hours and more surety on how this would be enforced. ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant. ECC have requested that the CWTP includes a firm commitment to providing a mini-bus. The Applicant has suggested in their latest response that the Contractor will review this when details of the workers are known. However, ECC believe this commitment can be included now as a key principle because	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		As noted in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, should the construction periods of other nearby projects overlap with the construction phase of the Project, discussions would be undertaken to identify opportunities to minimise the impact of the overlapping construction workforce vehicle movements on the highway network. This could include coordinated measures such as a minibus or shuttle service from local public transport hubs. Further detail will be included in the final Construction Worker Travel Plan. As also stated in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, the Travel Plan Coordinator (TPC) will act as mediator for anyone interested in car sharing.	wherever the workers are coming from there will be a need for a mini-bus to reduce vehicles coming to the site – for example, picking up from clusters of postcodes and/or key public transport nodes.	
3.11.16	Embedded mitigation	The Applicant notes this request and will enter into discussions with Essex County Council on the subject of emergency callouts that could reasonably be attributed to the Project.	Details on the approach to extraordinary maintenance have been provided in the Local Impact Report. ECC await confirmation from the Applicant as to whether this is accepted. ECC welcomes further discussions on the subject of emergency callouts.	Under Discussion
3.11.17	Embedded mitigation	The Applicant notes this request and will continue to engage with Essex County Council on this matter.	Further detail needed on shift patterns and how defined hours for construction workers assumed in the ES are managed and enforced. ECC refers to 3.11.5 and 3.11.7 for points raised on the CTMP that are relevant.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ECC welcomes further discussions on the subject of emergency callouts.	
3.11.18	Embedded mitigation	**7.11 Transport Assessment - Appendix G - Multi-Modal Transport ReportAPP-340]** provides detail of the assessment undertaken by the Applicant, to reduce the amount of distance travelled on road by freight vehicles. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of these being used to source materials where possible. The Applicant has committed to engage with the Developer's Forum and is happy to discuss with other developers the opportunities to reduce long distance road freight deliveries. The front-loaded scenario was included within the assessment detailed in **7.11 Transport AssessmentAPP-333].** This was completed to understand if any additional mitigation, above the 'just-in-time' scenario was required on road links from the Ports to the Primary Access Routes (PARs). The shorter timeframe in the front-loaded scenario resulted in higher impacts on the PARs but experienced over shorter periods of time. The Applicant and Main Works Contractor(s) will continue discussions with the Local Highway Authority when additional information on sourcing is available. The monitoring and management principles detailed in **7.3 Outline Construction Traffic Management PlanREP4-174]** are applicable to either	ECC welcomes the commitment to engage with the Developers Forum but is seeking a commitment in a relevant document to reduce the amount of distance travelled on road by freight vehicles and a multi modal strategy. It is important that this commitment is readily accessible to the Contractor to consider in more detail to determine what is feasible for Norwich to Tilbury. ECCs points on the CTMP have been raised at 3.11.5 and 3.11.7	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		scenario, with the Main Works Contractor(s) monitoring the number of HGVs accepted into site. The Applicant will adhere to the National Policy Statement EN-1 (2024),paragraph 5.14.13 requirements and will continue to engage with Essex County Council during the development of material sourcing. The Applicant does not consider the **7.3 Outline Construction Traffic Management PlanREP4-174]** to be the appropriate document for securing this requirement.		
3.11.19	Embedded mitigation	The Applicant has stated within the **7.3 Outline Construction Traffic Management PlanREP4-174]** 'Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary' (paragraph 5.4.17). The **7.3 Outline Construction Traffic Management PlanREP4-174]** additionally states 'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using thePrimary Access Routes] between the sites and theStrategic Road Network/Major Road Network]' (paragraph 6.2.6). It is expected that the monitoring of the construction vehicles will form part of the reporting to the Local Highway Authority. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3**	The Applicant has included a commitment to monitor construction traffic. However, ECC believe there needs to be confirmation in the **Outline CTMP [REP3-028]** to: • review the monitored levels of traffic against the specific number of vehicles assessed in the ES; and • to include a list of interventions that would be considered by the Contractor if the review shows the monitoring levels are above the assessed levels . Refer to 3.11.5 for points raised on the CTMP that are relevant. As already identified by ECC it is important that there is a commitment to monitor and review the number of vehicles in the ES and to include interventions where there is an increase. This is on the basis that we have agreed the traffic generation subject to the assumptions underpinning it. We therefore need to have some comfort that there is some accountability if the numbers were to be	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Outline Construction Traffic Management PlanREP4-174].	increased above what has been assessed through the DCO.	
3.11.20	Embedded mitigation	Numerous communication channels are set out in the **7.3 Outline Construction Traffic Management PlanREP4-174]**: • Community Liaison Officers will be appointed to engage with key stakeholders, local businesses and the community. • Community Liaison Officers to regularly inform the local community, including notification of heavy traffic periods and be aware of planned community events that may interface with construction operations. • Contact phone number (helpline) provided to the public to raise concerns and complaints. These will be listed in a register by the MWC, alongside a record of responses and actions taken to address each item. • Communication sent to the public through letters and emails, detailing the extent of the works and any related traffic management measures (which may impact the community). • Details on proposed traffic management is anticipated to be made available on the Project website. • Specific requirements for works in highways will outline the communications expectations for road works associated with the Project.	Wider commitment to engaging with the public. ECC welcomes the measures identified but considers further measures are required to be set out in the CTMP: • VMS boards at key locations • Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		In addition, Section 2 of **7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public InformationREP4-168]** details the complaints procedure that stakeholders can follow to report any complaints associated with the construction of the Project.		
3.11.21	Standard mitigation	Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in **Section 16.6** of **Chapter 16** (**Traffic and Transport**) of the **ESAPP-271]** and set out in the **7.2 Outline Code of Construction PracticeREP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with ECC on this matter.	As above for embedded mitigation in relation to keeping members of the community, local businesses and local stakeholders informed of the works. The CWTP is not yet agreed and forms part of the standard mitigation proposed. The Outline CTMP is not yet agreed and forms part of the standard mitigation proposed. Note points identified in the ECC Response to Inspector's Questions, Q1 **[REP3-078]** and replicated above at items 3.11.5-7.	Under Discussion
3.11.22	Additional mitigation	**6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. =Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. National Grid will continue to engage further with ECC where ECC has noted areas	Including mitigation for all PRoW that link onto or cross the PARs Mitigation for narrow footways on PARs Mitigation for road safety issues on PARs Crossing facilities/pinch points It is proposed that the extent of mitigation for the narrow footways, and PRoW that link onto or cross the PARs are included in the Road Safety Review which involves driving the PARs prior to construction starting. In this way the routes are considered based on the latest information.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		where it considers that further mitigation may be required. Section 5.9 of **7.3 Outline Construction Traffic Management PlanREP4-174]** details the proposed mitigation measures on PARs across the project. With specific regard to temporary alterations to PRoW connections to the highway network resulting from PRoW diversions, National Grid has engaged with Essex County Council and through this engagement the following eight locations have been highlighted for further consideration and will be subject to Road Safety Audits at the relevant stages of the design and construction process: • Langham 16 (Eastern End) • Langham 16 (Western End) • Great Tey 36 • Great Tey 38 • Great Tey 50 • Great Waltham 74 • Stock 37 • West Hordon 69.	It was discussed that the pinch point identified by ECC on Spa Road is being considered further by the Applicant – ECC await further detail. The form and scope of the road safety review is to be discussed in more detail.	
3.11.23	Additional mitigation	**7.11 Transport AssessmentAPP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple	A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management PlanREP4-174]** provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for workers arriving and departing from site, including the assessment assumptions.		
3.11.24	Additional mitigation	Schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and TransportAPP-271].** Where schools are directly located adjacent to a construction route, e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction**	Construction traffic restrictions where school activity exists on PARs. Note this point is dealt with at 3.11.7 and 3.11.10 above. In its **LIR [REP1-161] ECC have** raised concerns around activity concentrated on the PARs in the vicinity of the schools. ECC suggested on site observations are undertaken	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Traffic Management PlanREP4-174]. This included a review of all proposed schools identified during the review of committed developments. This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. A review of other existing schools where Essex County Council has raised concerns has been carried out. From our review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as detailed below: 1) Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic	by the Applicant to understand how the school children and parents moved in the area around the school as this is key to understanding the impacts of the potential interactions with the HGVs. In summary, it can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to the school drop off/pick up times. Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR)	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		2) Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic 3) Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic 4) Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing.		
EIA – Assessment Conclusions				
3.11.25	Construction effects - WCH	**6.16 Environmental Statement (ES) Chapter 16 - Traffic and TransportAPP-271]** assessed the likely traffic and transport impacts along those roads forming the Primary Access Routes, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and severance. Additional information for route-wide highway mitigation proposals is presented in **the 7.3 Outline Construction**	There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route. Impacts on pedestrians on narrow footways in rural locations along the PARs. Impacts on pedestrian's crossing along key desire lines along the PARs Comments at 3.11.22 are relevant to this point and the matter is being considered further by the Applicant. ECC await outcome of the review	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Traffic Management Plan Appendix C - Indicative Highway Mitigation PlansAPP-312 to APP-320, REP4-172 and REP4-173]. See above (**ID 3.11.24**) in relation to the impact on schools within the vicinity of the PARs. National Grid will continue to engage further with ECC where it has noted areas where it considers that further mitigation may be required. **The 7.3 Outline Construction Traffic Management PlanREP4-174]** whose purpose is to monitor, mitigate and manage the impacts around construction traffic. Section 5.9 of **7.3 Outline Construction Traffic Management PlanREP4-174]** details the proposed mitigation measures on PARs across the project, including on Spa Road.		
3.11.26	Construction effects - WCH	The Applicant will continue discussions with Essex County Council regarding the interface of the Project with any new schools that are linked to new developments.	Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations. Comments at 3.11.22 are relevant to impacts on existing school locations. Wording in the CTMP needs updating to reflect that the Contractor will continue discussions with ECC regarding impacts on any new schools.	Under Discussion
3.11.27	Construction effects – Spa Road	The location noted on Spa Road in Witham is identified in **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation PlansAPP-317]** (Section E, Sheets 5 and 6, Constraint E7). This indicates that it is proposed for street furniture to be removed from the location temporarily in	Effects at existing traffic calming features on Spa Road, Witham in relation to accommodating HGV movements. It is understood the Applicant is reviewing this particular location. ECC expect to have further	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		order to accommodate the design vehicle movements. Mitigation in the form of an appropriate traffic management arrangement (layout) will be agreed with the Local Highway Authority and put in place to replace the street furniture temporarily removed.	discussion when this review has been completed.	
3.11.28	Construction effects – PAR 50	For PAR 50 A1016 Waterhouse Lane/A1016 Rainsford Lane the mitigation Table A16.4.5 refers to should have stated that within the CTMP the Driver information pack will identify locations where there may be a higher number of cyclists and pedestrians on or crossing the carriageway. Along PAR 50 there would only be a 2% increase in traffic as a result of the Project. The assessment for severance on this PAR therefore found there to be no significant effects for WCH.	Agreed	Agreed
3.11.29	Construction effects - PRoW	The Applicant will engage further with Essex County Council on this matter.	ECC welcomes the commitment to further engagement on the outstanding matters regarding potential mitigation for PRoW interactions with the highway.	Under Discussion
3.11.30	Construction effects – bus passenger delay	The assessment of bus passenger delay presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** has been undertaken using all identified bus services including school buses. **7.3 Outline Construction Traffic Management PlanREP4-174]** sets out	ECC would like a stronger commitment in the CTMP that the Contractor will undertake early engagement with the bus operators and ECC on how to accommodate diversions or delays as a result of construction works.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		mitigation measures to minimise potential impacts on public bus services. The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption is minimised. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operations. **7.11 Transport AssessmentAPP-333]** details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority. The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan.		
	Construction effects – Fear and intimidation and Amenity	The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment of Traffic and Movement (2023)[2]. This therefore included a qualitative review and	ECC believes that site conditions have not adequately been considered, in particular, the effective footway width (e.g. PAR 39, PAR 41 and PAR 51). A qualitative review of fear and intimidation along Primary Access Routes (PARs) is requested alongside the IEMA thresholds is therefore requested. ECC suggest that the Applicant reviews all the PARs to ensure all locations have been	Under Discussion

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. For example, for PAR 37 A1124 Halstead Road mitigation has been proposed within the **7.3 Outline Construction Traffic Management PlanREP4-174]** to address the impact on Amenity and Fear and Intimidation. This included a driver information pack which will identify locations where pedestrians may be walking either on a verge or carriageway, ensuring adjacent vegetation is maintained to keep verge clear and allow the full width of footway to be utilised, and placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway. For PAR 41 there are verges of various widths located alongside the carriageway through rural sections and with limited trip attractors apart from Public Rights of Way (PRoWs); where pedestrians are likely to cross the carriageway to reach the opposite PRoW, it is unlikely that pedestrians would walk along the PAR itself which has a speed limit of 50 mph. Within the urban areas footways are provided with small sections of low level vegetation encroachment from adjacent verge. The residual construction significance of effects would therefore be slight adverse, temporary, and not significant. For PAR 42 and 43 there are a few localised short	appropriately assessed. This Road Safety Assessment would pick up all the locations that require siding out or cutting back of vegetation. If this is agreed with the Applicant then this should be included in the CTMP as a commitment.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		sections of footway that are narrowed by existing low level vegetation / encroachment from an adjacent verge that could be utilised. The increase in construction traffic on these PARs is notably low (17 HGVs an hour – 9 in each direction). The residual construction significance of effects is therefore considered to be slight adverse, temporary, and not significant. The Applicant will continue to engage with Essex County Council on this matter and will identify where further mitigation has been proposed e.g. Vegetation clearance/'siding out' of existing footways and maintenance of verges.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.11.32	Outline CoCP	**7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant construction related mitigation measures specified in **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** and is appropriate for managing construction impacts from the Project. Meeting held on 9th October to agree on the structure for the **7.2 Outline Code of Construction PracticeREP4-164].** National Grid will continue to engage with ECC on this matter.	Discussion related to 3.10.7 - 3.10.10	Under Discussion
	Construction effects	The **7.11 Transport AssessmentAPP-333]** provides the assessment of the junctions along PARs 50 and 51 at Chelmsford and PAR 59 at	The latest position is set out in the Response to **Local Impact Report [REP 2-030]:**	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Billericay. On those junctions that are forecast to operate at or over capacity on the future baseline scenarios during the worst-case peak period, there may continue to be some level of impact outside of that period. However, typically there is only a marginal impact upon capacity due to the addition of the Project construction traffic flows over the existing and/or future baseline scenarios. The Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower. The results of the modelling of Site 40 shows that the junction currently operates already over capacity during the PM peak hour and there is no predicted change in junction performance or state as a result of the Project construction flows with a change of the RFC from 0.88 to 0.93 in the AM peak and 1.07 to 1.12 in the PM peak hour. However, there is a proposal to signalise this junction as part of the planning application Colchester Northern Gateway South (reference 190665) that would form part of the future baseline scenario. The Applicant will continue to engage with Essex County Council and National Highways on this matter.	PARS 50, 51 and 59 are described as having a similar level of traffic over a longer period (4 months) as to the one-week period. The level of impact for these links are defined as "significant" in Table A16.4.2 of the Appendix 16.4 Environmental Statement (APP-275). The Applicant has downgraded the impact on the basis that the worst case is for one week, whereas the impact will be same for 4 months as traffic flows are similar. It is unclear how the level of impact is reduced outside of the construction peak period of one week when the traffic flows outside of the construction peak period for four months are similar.	
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.11.32	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 3 of **7.11 Transport Assessment APP-333].**	Agreed	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
Transport Assessment – Approach and Methods				
3.11.33	Study Area	The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within Section 2.21 of **7.11 Transport AssessmentAPP-333]**. The Study Area is considered appropriate for the assessment.	The study area is agreed.	Agreed
3.11.34	Multi-modal Strategy	A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within **Appendix G of 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report APP-340]**. The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).	The multi modal assessment is considered appropriate.	Agreed
3.11.35	Junction Capacity Assessment Methodology	Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented in Section 6.9 of **7.11**	Agreed	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Transport AssessmentAPP-333]. This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate.		
3.11.36	Junction Modelling	The methodology used for undertaking junction assessments is presented in **S**ection 6.9 of **7.11 Transport AssessmentAPP-333]**. The assessment methodology used is considered appropriate.	Accept use of JUNCTIONS 10 and LINSIG industry standard software for the junction modelling.	Agreed
3.11.37	Assessment of WCH	Discussion related to **ID 3.11.25** to **ID 3.11.27** National Grid will continue to engage with ECC on this matter.	Note the TA reference is 7.16 (not 7.4) There are construction effects on all PRoW users (where there is no footway available to walk between points or cross over) along the construction route. Note details of PAR 39, 41 and 51. Impacts on pedestrians on narrow footways in rural locations along the PARs. Examples include PARs 37, 41-43. Further review of rural lanes with narrow footways on PARs Impacts on pedestrian's crossing along key desire lines along the PARs. Effects at existing traffic calming features on Spa Roa, Witham in relation to accommodating HGV movements (PAR 43).	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Effects on schools where there is concentrated activity on PARs – to include existing and planned school locations. Note the above points still need to be agreed and ECC welcomes further engagement on this matter	
3.11.38	Impact on Parking	Within the **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** and **7.11 Transport AssessmentAPP-333]** parking impact was assessed using standard criteria but was also assessed on a site by site basis reviewing each location's characteristics. Within The **7.11 Transport AssessmentAPP-333]** locations where temporary parking restrictions will be required are identified. A review against Schedule 13 within the **3.1 Draft Development Consent OrderREP4-037]** found that there are discrepancies. A review of this will be undertaken and the Environmental Statement and Transport Assessment amended to reflect this change.	Discrepancies between text in TA and TRO Schedule for on street parking restrictions to be discussed. ECC welcomes the review by the Applicant and awaits the changes in the ES and TA.	Under Discussion
3.11.39	Existing road side facilities	The Applicant has provided in **8.4.1 Applicant's Comments on the Relevant RepresentationsREP1-132]** a detailed response to paragraph 6.3.8 of the **Relevant Representation by Essex County CouncilRR-1083].** With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter with Essex County Council.	Discussions to be undertaken on surveys for existing road side facilities. Note suggested text for CTMP in relation to this point as set out in our response to ExQ1 **[REP3-078]** The Applicants response to this point in (**8.4.1 Applicant's Comments on the Relevant RepresentationsREP1-132]**) is noted. ECC suggested text for inclusion in the CTMP in relation to this point as set out in our response	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			to ExQ1 **[REP3-078]** at TT 1.36 and a response on this is awaited.	
3.11.40	Impact on parking	As defined in **the 6.19 Scoping ReportAPP-296]**, the assessment criteria and magnitude of parking impact is based on the number of spaces lost for any period over four weeks. The assessment in the Environmental Statement indicates that the suspension of parking is expected only during arrival/departure of AIL vehicles and is therefore short-term (significance of effect has been established as not significant). Given the duration of the impact and the type of parking affected (e.g. informal kerbside parking), parking surveys were not deemed necessary. National Grid considers that parking surveys would not materially affect the assessment findings, and the resulting impact of the parking suspension.	Note comments above at 3.11.9	Not Agreed
3.11.41	Existing roadside facilities	A detailed CTMP will be developed and approved by Essex County Council post consent under Requirement 4 of Schedule 3 to the **3.1 Draft Development Consent OrderREP4-037]**. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Essex. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a	Impact on HGV driver facilities. Note comments on item 3.11.39 The Applicants response to this point in (**8.4.1 Applicant's Comments on the Relevant RepresentationsREP1-132])** is noted. ECC suggested text for inclusion in the CTMP in relation to this point as set out in our response to ExQ1 **[REP3-078]** at TT 1.36 and a response on this is awaited	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Essex will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site. With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter with Essex County Council.		
3.11.42	Road Safety	The Applicant assessed the impact of the Project on the Primary Access Routes (PARs) and set out **in 7.3 Outline Construction Traffic Management PlanREP4-174]** its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant is considering the new information provided in the LIR (road safety improvements recommended by Essex County Council (ECC) in relation to the Project). The Applicant will continue to work with ECC to understand the scale of each scheme, the relationship to the Project including timescales, the priorities and contributions requested.	Under Discussion – ECC have a number of locations on the PARs that the applicant needs to consider. ECC to provide background to the schemes and costings for the Applicant to review.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		1. Botney Hill Road/Farm Access – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 2. B1002 (between Ingatestone and Margaretting) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 3. Ongar Road (near Hanging Gardens Nurseries) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 4. Roxwell Road/Vicarage Road – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 5. B1018 nr Temple Barns – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 6. A134 Nayland Road, Horkesley – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC to confirm the speed limit reduction that it is seeking. 7. Wick Lane/Dead Lane – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		8. A129 – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 9. A414 Three Mile Hill (off A12) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 10. Margaretting – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 11. Cuckoo Wood (A131) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 12. Galleys Corner – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.		
3.11.43	Road Safety – Road Safety Scheme on A1060 Roxwell Road	The Applicant assessed the impact of the Project on the A1060 Roxwell Road and set out in **7.3 Outline Construction Traffic Management PlanREP4-174]** its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant is now in discussions with Essex County Council regarding the potential new road safety	ECC have funding to deliver these works and so funding for this scheme is no longer required.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		scheme for the A1060 Roxwell Road that Essex County Council has highlighted in its LIR. The Applicant is also reviewing the relationship of the safety scheme to the Project. The Applicant will continue to work with Essex County Council to understand the commitment that Essex County Council is seeking in relation to the A1060 Roxwell Road.		
Transport Assessment – Mitigation Measures				
3.11.44	Junction Mitigation Measures	Traffic data and modelling files have been provided to ECC for review to allow for mitigation to be agreed. A technical note is to be provided to ECC outlining the findings of the updated modelling for those junctions where ECC raised concerns that the baseline scenario models presented in the **7.11 Transport AssessmentAPP-333]** did not appear to accurately reflect baseline operation (as expected by ECC) or where the future baseline highway layout will be changed as a result of improvements provided by other committed developments. The modelling and traffic flows for these will be provided to ECC for review. Further engagement with ECC to be arranged to discuss modelling results and all mitigation.	Junction mitigation to be agreed. Same comments as per ES as both documents are related. Note comments in 3.11.23. A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant.	Under Discussion
	Site 38	The assessment of the junction modelling of Site 38 – Ardleigh Crown Interchange and Site 47 - A120 Coggeshall Road / Great Tey Road is presented in **7.11. Transport AssessmentAPP-333].** Both junctions are	*As set out in ECC's **LIR [REP1-161] "The high**est queue is on the A120 (eastbound) at Ardleigh Crown Interchange with an increase of 25 vehicles both during the peak of construction and the 85th percentile peak. The*	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		expected to operate over capacity in the future scenarios that were modelled: future baseline with committed developments and future baseline with committed developments and the Project. Mitigation to reduce queues and delays has been investigated for both junctions but not yet agreed. The Applicant will continue to engage with National Highways and Essex County Council to discuss and agree the junction capacity mitigation measures at these sites. This will be documented in this Statement of Common Ground as well as in **5.9.20 Draft Statement of Common Ground - National HighwaysREP4-095]**.	*existing junction is already congested based on the output included in Appendix H.4 of the Transport Assessment. Additional queues on Tey Road are shown to be made up of 18 vehicles (12 left and 6 right) in the AM peak and minimal in the PM peak during peak construction, and 7 vehicles (5 left and 2 right) based on 85th percentile flows. However, considering this is a rural lane with existing queues (and future base flows) of around 1-2 vehicles, the effect is likely to be noticeable by regular users – particularly in the AM peak during the peak of construction."* *This position remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed. .*	
	Sites 48, 73, 69, 71, 74 & 82	As mentioned in Section 5.9 of **7.3 Outline Construction Traffic Management PlanREP4-174]**, it is anticipated that the Main Works Contractor(s), in partnership with the Local Highway Authority, will monitor the key junctions on the highway network where temporary or permanent mitigation has not been suggested due to the anticipated limited impact of the Project construction traffic. The junctions where monitoring of the operation of the junction is proposed are identified in Table 5.9 of **7.3 Outline Construction Traffic Management PlanREP4-174]**. Details of the modelling assessments undertaken at these	*As set out in ECC's **LIR [REP1-161] "Table 7**.1.21 of the TA (APP-333)) includes junctions where monitoring of the operation of the junction is proposed (with Table 5.9 in the Outline CTMP (APP-309) showing that mitigation is yet to be agreed). ECC would welcome further discussion and confirmation around the principles of monitoring and what will be implemented if the monitoring identifies issues at the following locations:* • A120 Braintree Bypass/A131 Great Notley Bypass – monitor operation of junction and temporary signage to warn general traffic of peak hour congestion (Site 48)	**Under Discussion**

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		junctions are presented within Section 7 of **7.11 Transport AssessmentAPP-333]**. The Main Works Contractor(s) are proposing to use a delivery management / scheduling system utilising Global Positioning System (GPS) technology. This will allow the Project's Transport Coordinator(s) to record and monitor the number of vehicles passing through those junctions identified where temporary or permanent mitigation has not been suggested. A quarterly report will be prepared by the Transport Coordinator(s) and shared with the highway authority. The Applicant has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council**RR-1083]**. The Applicant envisages that the routeing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum.	• A127 Southend Arterial Road/A176 Noak Hill Road – priority junction – monitor operation of junction (Site 73) • A1060 Roxwell Road/Lordship Road – roundabout – monitor operation of the junction (Site 69) • A414 Greenbury Way/Highwood Road – roundabout – monitor operation of the junction (Site 71) • A176 Noak Hill Road/Wash Road – priority– monitor operation of the junction (Site 74) *A129 London Road/Mountnessing Road – priority junction – monitor operation of the junction (Site 82)"* *The commitment to the Developers Forum is welcomed but further information on the monitoring / reporting process is requested* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed.	
	Site 58 & 63	**7.11 Transport AssessmentAPP-333]** provides details of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. It should be	*As set out in ECC's **LIR [REP1-161]*** **Two junct**ions that have been modelled which include mitigation in the form of temporary signage where the model predicts theoretical	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]** to reduce the number of single occupancy private car trips or flexible working practices. However, the Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. The Applicant has and will continue to liaise with Essex County Council on this matter.	congestion (RFC value is above 1.0) in the AM peak: • Site 58 - A131 Great Notley Bypass/Main Road Roundabout • Site 63- A414 Three Mile Hill/A1114 London Road Roundabout *"ECC considers a better approach would be to restrict development traffic during the AM peak particularly in the short-term worst-case construction peak where impacts are higher. A reduction in development traffic could be introduced alongside temporary signage warning of peak hour congestion and highlighting alternative appropriate routes (to be agreed with ECC) for the longer-term impact."* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed.	
	Site 63	The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** for PAR 49 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The results of the modelling of Site 63 in **7.11 Transport AssessmentAPP-333]** shows that	*As set out in ECC's **LIR [REP1-161] "Link PAR** 49 includes mitigation in the form of temporary signage to warn motorists of forthcoming delays (as discussed above in relation to the junction impact at Site 63). As the driver delay for the overall link is determined as severe then ECC considers a higher level of mitigation at the junction of Site 63 is required to reduce the impact"* This position on this issue remains unchanged and is consistent with comments made at	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		the junction currently operates already at or over capacity in the future baseline scenarios and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 1.02 to 1.10 in the AM peak hour and 0.91 to 0.96 in the PM peak hour. The Applicant will continue to engage with Essex County Council on modelling and mitigation.	3.11.23 although further engagement with the Applicant ion this issue is welcomed.	
	Sites 69, 81 & 82	The Applicant will continue to engage with Essex County Council on modelling and mitigation. The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction EffectsAPP-275]** for PAR 51 and PAR 59 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 2% and 1% respectively) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The Applicant will continue to engage with Essex County Council on modelling and mitigation. In relation to PAR 51, Site 69 is the only junction that operates at or over capacity. The results of the modelling of Site 69 in **7.11 Transport AssessmentAPP-333]** shows that the junction currently operates already at or	*As set out in ECC's **LIR [REP1-161] "Link PAR** 51 and 59 both include junctions that are to be monitored. These are mentioned in the previous list of junctions to be monitored but is highlighted here as the links are considered as having a significant impact where mitigation is necessary.* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		over capacity during the PM peak hour and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour. In relation to PAR 59, the junction modelling for Site 81 indicated that there is not a predicted significant change in junction performance as a result of the Project and the junction would operate marginally over practical capacity in the PM peak hour, with an increase of the Degree of Saturation (Dos) from 91% to 93.1%. A proposal of signal time optimisation would reduce the effects. The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in available space to turn from the A129 with the addition of construction traffic. The junction will operate over capacity in the AM peak hour with an increase of RFC from 0.83 to 0.91 and at capacity in the PM peak hour with changes of RFC from 0.87 to 0.88. The Applicant is proposing to monitor the performance of this junction during construction.		
	General	**7.11 Transport AssessmentAPP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple	*As set out in ECC's **LIR [REP1-161] "ECC is of** the opinion that there will be impacts on the local highway network with the level of construction traffic included. Mitigation in the form of restricting construction traffic during the peak hours needs to be explored further along with the use of sustainable transport*	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management PlanREP4-174]** provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for workers arriving and departing from site, including the assessment assumptions.	*infrastructure to reduce background traffic and offset impacts. The impacts at these junctions also highlight the importance of controls being in place to ensure that workers do not arrive/depart site during the network peak hours which is a fundamental assumption in the transport assessment undertaken , and that suitable Construction Worker Travel Plan measures for office staff who are assumed to travel in the peak hours, are also secured."* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed Note comments on the CTMP at 3.11.5-7 which are relevant.	
Transport Assessment – Baseline Conditions				
3.11.45	Baseline conditions	The Applicant will continue to engage with ECC regarding junction surveys and modelling (see **ID 3.11.3** and **ID 3.11.44** above). The **7.11 Transport AssessmentAPP-333]** refers readers to **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]**	This position on this issue remains unchanged and further engagement with the Applicant is welcomed. Refer to items 3.11.7 and 3.11.10 above for receptors	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		in relation to baseline conditions identified for PARs and the LRN characteristics, existing traffic flows, sensitive receptors, personal injury collision data, bus and rail services, and road sensitivities. National Grid would welcome further engagement on the collision analysis.	Refer to item 3.11.8 above for personal injury collision data. Refer to item 3.11.13 on traffic surveys/modelling.	
3.11.46	Baseline conditions	Construction traffic to be generated by the Proposed Project and its routeing has been assessed and is not expected to result in any significant effects on the surrounding highway, following the measures identified within the **7.3 Outline Construction Traffic Management PlanREP4-174].** A detailed Construction Traffic Management Plan (CTMP) will be developed and approved by Essex County Council post consent under Requirement 4 of Schedule 3 of the **3.1 Draft Development Consent OrderREP4-037**]. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Essex. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Essex will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more	Refer to items 3.11.5-7 above which relates to commitments required in the Outline CTMP. Refer to item 3.4.41 for driver facilities.	Under Discussion

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		likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site.		
Transport Assessment – Future Baseline Conditions				
3.11.47	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in Chapter 5 (Future Baseline) of **7.11 Transport AssessmentAPP-333].** Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	Agreed	Agreed
3.11.48	Cumulative Developments	National Grid confirms that a review of all committed developments was undertaken prior to the submission of the **7.11 Transport Assessment APP-333]** to the Planning Inspectorate. This submission included the majority of the committed developments subsequently listed by Essex from their review of the draft TA. Where developments were omitted, a review has been undertaken to understand whether they should have been included. It was found that two developments would occur during the Project peak	A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC to review prior to further discussions on junction mitigation with the Applicant.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		construction period: 19/01725/OUT Land North of London Road Billericay Essex and 23/02807/OUT Land West of Horizon 120 Phase 2 Horizon Boulevard Great Notley Braintree Essex. A review is currently being undertaken to understand the effects of the increase in traffic on the Primary Access Routes and junctions affected. National Grid will engage with Essex following this review. The **7.11 Transport Assessment – Appendix D – Committed DevelopmentsAPP-337]** provides an overview of the committed developments and transport schemes that were considered in the assessment of traffic on the road links forming the Primary Access Routes (PARs). Against each development a commentary has been provided as to whether it needs to be included within the assessment of traffic and transport. Update to position (April 2026) The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs.. This review will be published into Examination.		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Transport Assessment – Trip Generation				
3.11.49	Key Assumptions	Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** and Section 6.7 of **Chapter 6** of the **7.11 Transport Assessment APP-333]**. The key assumptions presented are considered appropriate. National Grid will continue to engage with ECC on this matter.	Note comments for 3.11.5 as both TA and ES use same assumptions: • ECC position pending sight of • In ECC's response to ExQ1 **[REP3-078]** the following wording was provided to deal with the above assumptions on workers arrival/departure times: • To update paragraph 5.4.17 of the CTMP with: "The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed." • To update Section 2.3 Working Hours to include the following: • Staff working hours will be < • Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs • Table 6.1 at "Monitoring of vehicles and road network" to include: • Monitoring vehicle movements of HGVs and construction workers.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			• ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and.or community members. We provided some suggestions as follows: • extending the programme of works to reduce the impact of traffic; • warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site;and further disciplinary actions as necessary for repeated incidents • closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or • implementing additional shuttle buses to reduce worker traffic. • Update to the list of non-compliance at Section 6.4.1 as follows: • Construction traffic (including workers) operating outside the agreed hours • The list of non-compliance at Section 6.4.1 to include: • Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES • In the response to the applicant's comments to ECC's LIR we included the following	

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			points relevant to the CTWP on car occupancy rates and mode share: • ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2). • ECC does not see why the baseline and future targets could not be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP. • ECC requested that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network. • ECC require the CTWP (APP-311) to include a commitment to the use of a crew vehicle for the overhead line workers travelling from compound to sites.	

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			• The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site.	
3.11.50	Methodology	The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of **7.11 Transport AssessmentAPP-333]** is considered suitable and robust. National Grid will continue to engage with ECC on this matter.	The methodology is agreed in that it based on other sites. However, this is subject to receiving further detail on mitigation which has not yet been agreed and needs to be informed by experience of other sites ECC welcomes the commitment to further discussion on this issue.	Under Discussion
3.11.51	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in Section 6.3 (Construction Vehicles Overview) of **7.11 Transport AssessmentAPP-333]**. The trip generation is considered appropriate. National Grid will continue to engage with ECC on this matter.	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet. ECC welcomes the commitment to further discussion on this issue.	Under Discussion
3.11.52	Construction Workforce Trips	Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.4 (Construction Staff Overview) of **7.11 Transport AssessmentAPP-333]**. **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline**	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Construction Worker Travel Plan[APP-311] has been prepared as part of the DCO application and is contained as an appendix within the **7.3 Outline Construction Traffic Management PlanREP4-174].** The Outline CWTP will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate. National Grid will continue to engage with ECC on this matter.	agreed as yet. ECC welcomes the commitment to further discussion on this issue.	
Transport Assessment – Conclusions				
3.11.53	Overall impact of the Project	The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of the **7.11 Transport Assessment**)**APP-333]**. The conclusions are considered appropriate. National Grid will continue to engage with ECC on this matter.	The mitigation/management and monitoring is not agreed. ECC welcomes the commitment to further discussion on this issue.	Under Discussion
Outline Construction Traffic Management Plan (CTMP)				
3.11.54	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in Section 3 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**. These are considered to be clear and sufficient for the delivery of the Project.	Agreed	Agreed
3.11.55	Pre-and Post Construction Surveys	The Main Works Contractor(s) will create a record of Primary Access Routes (PARs) as part of the pre-construction conditions surveys of the existing highway network. The pre-	Further discussions/commitments needed on regular monitoring of road conditions extraordinary flows and maintenance liability for	Under Discussion

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		construction condition surveys are proposed to be undertaken on all Abnormal Indivisible Load and HGV routes, as detailed in Section 5.2 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**, with the proposed methodology to be agreed with the Local Highway Authority. The results of these pre-condition surveys will be shared with the Local Highway Authority prior to works commencing, including pre-commencement works relating to the highway. Section 6.2 of the **7.3 Outline Construction Traffic Management PlanREP4-174]** details how post-construction condition surveys should be undertaken after construction, and the results of these and any remedial works will be discussed and agreed with the landowner and, where applicable, the relevant highway authorities, prior to handover. The point raised by Essex County Council regarding the monitoring road conditions through quarterly observations during the construction period is noted. The Applicant will work with Essex and the Main Works Contractor(s) to agree the condition monitoring approach during construction.	local highway network (including road and structures). ECC welcomes the commitment to further discussion on this issue.	
3.11.56	Traffic Management Measures	Traffic Management is set out within Section 5.8 of **7.3 Outline Construction Traffic Management PlanREP4-174].** The Applicant's Main Works Contractor is to develop traffic management proposals including signage in accordance with the **7.3 Outline Construction Traffic Management**	It is agreed that further discussions on semi-permanent traffic management will be undertaken with the Contractor.	Agreed

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		PlanREP4-174] which are to be agreed with the Local Highway Authorities. As set out in Section 6.2 of the **7.3 Outline Construction Traffic Management PlanREP4-174],** regular site checks are required to be carried out across the Project. Table 6.1 lists weekly frequency for monitoring of the road network with Transport Coordinators checking signage is in place. The visibility splays and Traffic Regulation Orders presented in the **3.1 Draft Development Consent OrderREP4-037]** have been developed to allow for some flexibility should a more semi-permanent arrangement be appropriate. Further development of traffic management associated with the works will be undertaken by the Main Works Contractor, in consultation with Essex County Council.		
3.11.57	Traffic Management Measures	National Grid will continue to engage with ECC on this matter	ECC welcome commitment to discuss disruption to bus services (particularly school buses) with bus operator/LHA where routes are diverted with a view to minimising impacts– regardless of duration.	Under Discussion
3.11.58	Implementation/ Enforcement	The implementation and enforcement process set out in Section 6 of the **7.3 Outline Construction Traffic Management PlanREP4-174]** is considered to be appropriate and adequate for the Project. National Grid will continue to engage with ECC on this matter	Detail and discussion required regarding • enforcement measures that would be implemented by the Contractor if there were issues identified. • ECC welcomes further engagement with National Grid.	Under Discussion

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3.11.59	Implementation/ Enforcement	Numerous communication channels are set out by the **7.3 Outline Construction Traffic Management PlanREP4-174]** to allow for appropriate community engagement]: • Community Liaison Officers will be appointed to engage with key stakeholders, local businesses and the community. • Community Liaison Officers to regularly inform the local community, including notification of heavy traffic periods and be aware of planned community events that may interface with construction operations. • Contact phone number (helpline) provided to the public to raise concerns and complaints. These will be listed in a register by the Main Works Contractor(s), alongside a record of responses and actions taken to address each item. • Communication sent to the public through letters and emails, detailing the extent of the works and any related traffic management measures (which may impact the community). • Details on proposed traffic management is anticipated to be made available on the Project website. • Specific requirements for works in highways will outline the communications expectations for road works associated with the Project.	Refer to point 3.11.20 which requires the following to be included as a commitment: • VMS boards at key locations • Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant commits to joining and engaging with the Developers Forum to continue and formalise their stated engagement within the **7.3 Outline Construction Traffic Management PlanREP4-174]** to coordinate the approach to traffic management.		
Outline Construction Workers Travel Plan (CWTP)				
3.11.60	Policy	The Final Construction Worker Travel Plan will be developed by the Main Works Contractor(s), in collaboration with Essex County Council. It is anticipated that the targets developed within the final construction worker travel plan will form part of the baseline expectations. This will take into account the operational status of each site.	The Essex Travel Plan Guidance includes the requirement for baseline figure and targets to be included in the CWTP ECC would refer to its response to the Applicants comments on ECC's LIR**APP_REP3-077]** which stated "ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2). It is unclear why the baseline and future targets cannot be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP."	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.61	Site Accessibility Review	The Site Accessibility review is captured within Section 4 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan**. This review is appropriate for the Project.	Agreed	Agreed
3.11.62	Targets, Strategy, and Measures	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan and will engage with the Local Highway Authorities on the appropriate methodologies to encourage construction workers to travel to the site via more sustainable modes. Best practice from other Development Consent Orders will be used to inform this discussion. The location of construction staff is currently unknown. Once this information becomes available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures.	Note item 3.11.61 above for targets. ECC would refer to its response to the Applicants comments on ECC's Reference to LIR**APP_REP3-077]** which stated:"We request that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network." As part of their commitment to promoting and encouraging sustainable travel and reduced parking as well as reducing single occupancy car use, ECC believe a firm statement (rather than a consideration) to utilising minibuses is necessary and proportionate. This should be included in the CWTP. In this way, the commitment will ensure that the Contractor works towards implementing a scheme that is appropriate for the workforce (both shift workers and office staff) – that could mean drop off/pick up at clusters near workforce accommodation and/or sustainable travel hubs.	Under Discussion
3.11.63	Targets, Strategy, and Measures	Section 7.6 of the **7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel**	Parking management. ECC requires confirmation that there are interventions that can be put in place as	Under Discussion

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		PlanAPP-311] sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met. The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of the **7.3 Outline Construction Traffic Management PlanREP4-174]** provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non-compliance and would follow the non-Compliance procedure in Section 6.3 of the **7.3 Outline Construction Traffic Management PlanREP4-174].**	mitigation if the assumptions do not come to fruition on mode share and associated parking numbers, number of workers and worker arrivals/departure times. The non compliance procedure sets out how mitigation will be discussed with ECC and the Contractor. ECC would expect some high level potential interventions to be included in the CWTP which would be agreed with ECC. In this way, the Contractor has clarity on the types of interventions that are expected to be agreeable with ECC and allows a starting point for discussions for agreement.	
3.11.64	Targets, Strategy, and Measures	Section 6.3 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]** sets out the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the full CWTP) which focuses on the delivery of travel plan measures.	The commitment to an action plan is welcome. However, ECC believe there should be some firm commitments that can be included in an Action Plan within the Outline CWTP. This will set the framework for the Contractor to update and review as part of the detailed CWTP.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.65	Monitoring and Review	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel PlanAPP-311]**, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contactor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.	As mentioned in ECC's LIR**REP1161]** at paragraph 6.21.10, the monitoring and review should relate to the specific groups of staff so that it can be related back to the assumptions in the initial assessment. Specific questions on Monitoring and Review include: • When and how often will the mode share and parking accumulation be collected? • Why is car occupancy not included in the data collection as this will be important to understand the level of car sharing? • How will the parking be monitored? • How will off site parking impacts be identified?	Under Discussion
Construction Access Strategy and Design				
3.11.66	Construction Access Approach	The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within Section 5 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**. This approach is considered to be suitable for construction traffic for the Project.	Construction access utilising designated routes is an agreed approach.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.67	Primary Access Route Selection	Initial responses in reply to the road safety audit findings for highway mitigation and site access points were prepared by the Design Organisation and submitted to the Essex CC LHA as Overseeing Organisation back in July 2025 accompanied by the audit reports, audit briefs and drawings. These Design Organisation responses have since been updated to consider any Overseeing Organisation comments or responses received back, and these updates will be shared with the LHA setting out agreed/further action points in advance of the commencement of the stage 2 detailed design development.	ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane	Under Discussion
3.11.68	Construction Access and Crossover Design	The Applicant concurs with Essex County Council's stated position that – where achievable – proposed speed limits should broadly be self-enforcing. The Applicant is also aware of concerns expressed by Essex County Council relating to specific locations where it may not necessarily be practicable to achieve a self-enforcing speed limit, and will continue to engage with Essex County Council and other stakeholders as appropriate with a view to addressing such concerns. The Applicant has sought to include proposals for Traffic Regulation Orders (TROs), including where these relate to reductions in posted speed limits, in support of the safe and effective provision of site access, crossover, and mitigation proposals interfacing with the Public Highway. This approach is outlined in	ECC remains in discssio9n with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		7.3 Outline Construction Traffic Management PlanREP4-174]. Designs relating to these locations have been subject to the Road Safety Audit (RSA) process – with oversight from the relevant Local Highway Authorities for each area of the scheme – set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA StrategyAPP-334].** This process included consideration of both posted speed limits and, where available, speed survey information. Survey locations are shown in **7.11 Transport Assessment – Appendix I – FiguresAPP-342]** – noting that Project traffic count surveys also included the recording of speed information, as discussed in **6.16 Environmental Statement Chapter 16 – Traffic and TransportAPP-271].** On this basis, proposed TROs are considered to broadly account for driver behaviour in a suitable and realistic manner.		
3.11.69	Highway Mitigation Design	Red and orange locations as described in the **7.3 Outline Construction Traffic Management PlanREP4-174]** for indicative highway mitigation were subjected to RSA1. Initial responses in reply to the road safety audit findings for highway mitigation locations were prepared by the Design Organisation and submitted to the Essex CC LHA as Overseeing Organisation back in July 2025 accompanied by the audit reports, audit briefs and drawings.	ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Design Organisation responses have since been updated to consider any Overseeing Organisation comments or responses received back, and these updates will be shared with the LHA setting out agreed/further action points in advance of the commencement of the stage 2 detailed design development. Yellow and green locations of highway mitigations have not been subjected to RSA1, however, those locations and summary details for each location are set out within **7.3 Outline Construction Traffic Management Plan Appendix C - Guide to the Plans and Master Key PlanAPP-312]** and the **7.3 Outline Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans - Sections A to HAPP-313 to APP-320, REP4-172 and REP4-173].**		
3.11.70	Traffic Management	Any required road markings and associated signage will be designed and installed in conjunction with Traffic Signs Manual chapters, and the proposals will be subject to approval from the LHAs prior to construction commencement.	It is agreed that TM will need to be designed and installed in accordance with Traffic Signs Manual chapters and the proposals will be subject to approval through the detailed design process post DCO.	Agreed
3.11.71	Traffic Management	All temporary construction measures—such as site access points, crossing points, and any highway mitigation works—will be removed upon completion of the project, with all areas reinstated to a condition agreed with the relevant parties.	On the basis of this commitment, this matter is agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Notwithstanding the above, there may be scope for the relevant local authority to approve a reinstatement condition other than previous condition/use. However, this would be subject to an assessment of environmental effects, landowner agreement and any separate planning permission resulting from a continued use or new end use. This matter would be considered outside the development consent process, since it is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order		
3.11.72	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The Applicant would welcome further engagement with the Local Highway Authority to discuss the detail, form and durations of the draft Traffic Regulation Orders (TROs) in Schedule 13. The Applicant has conducted traffic and speed surveys in the locations of proposed Site Access Points and Crossover Points. This data has been considered within the design of these locations and the proposed implementation of any speed limit restrictions. During construction of the Site Access Points, Crossover Points and highway mitigation works, there may be works where it is not safe or practicable for the public highway to remain fully available for use. During these limited periods, the Applicant would seek to maintain access through the deployment of traffic management.	ECC welcomes further discussion on this issue Further information is awaited following a meeting in March with the Applicant before ECC can provide comment on the TROs and this is listed together with ECC's main concerns on what has been provided to date is included in ECC's **LIRREP1-161] at paragr**aphs 4.5.104-106.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Should this not be feasible or operationally reasonable, due to factors such as limited existing carriageway width, the Applicant would seek to implement a limited duration closure. In addition, short-term road closures are required for netting activities associated with the overhead line stringing. These closures are of very short duration (hours rather than days) and can occur at night, further limiting potential disruption. Due to the limited duration and occasional nature of these potential closures, the Applicant does not consider it appropriate to conduct traffic flow or speed surveys along diversion routes, in line with typical temporary road closure procedures. Given their limited carriageway width, generally the closures will be required on more minor local roads, and therefore it is anticipated that there will be a limited traffic flow impact resultant from these closures. Additionally, the use of diversion routes would not change the existing road speed conditions to trigger the requirement to obtain speed data along these routes. All works will be coordinated with the Local Highway Authority by the Main Works Contractor through the use of the permit scheme. The Applicant has and will continue to work with Essex County Council regarding the		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		requirement for further survey work in relation to on-street parking.		
3.11.73	Traffic Regulation Orders and Temporary Traffic Regulation Orders	Traffic Regulation Order (TRO) durations – The works programme is yet to be finalised, along with the requirements of commencement dates, so durations of all TROs are unable to be confirmed at this time.	ECC maintains its position stated in its **LIRREP1-161] that:** • **th**e TRO should include the duration of the orders so as to fully understand the impacts • ECC refers to its response to the Applicants comments on ECC's Reference to LIR**APP_REP3-077]** • Paragraph 4.5.106 sets out more detail on the reasoning for the requirement for durations as a standard approach to TRO consultation	Under Discussion
3.11.74	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The **7.3 Outline Construction Traffic Management PlanREP4-174]** sets out details and reasoning for consideration by the contractor relating to traffic management and TROs, including references to Local Highway Authority permit scheme, and lengths (distance and duration) of traffic management measures. The Applicant is preparing further information and will continue to engage with the Local Highway Authority on the reasons for the TROs.	Position from Local Impact Report: There should be a statement of reasons for the orders so that we can understand what is trying to be achieved so ECC can review against the necessary specific and relevant orders that are to be implemented and to understand the purpose (for example, restricted access) Full details of ECC's request for further information and main concerns on what has been provided to date is included in our LIR at paragraphs 4.5.104-106. A meeting was held with ECC and NG in March to discuss the TROs and the information required. NG are due to send through further information for review.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.11.75	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The key on the **2.4 Traffic Regulation Order Plans (Sections A to H)APP-025 to APP-032, REP4-017 and REP4-018]** presents in their Legend whether the TROs are either for temporary or permanent traffic regulation measures or restrictions. Additionally, Part 4 of Schedule 13 of the **3.1 Draft Development Consent OrderREP4-037]** lists all TROs for the Project that relate to permanent traffic regulation measures or restrictions, whereas Parts 1 to 3 lists all TROs relating to temporary traffic regulation measures or restrictions.	Having rechecked we can see the legend includes both temporary and permanent TROs. Therefore, agreed.	Agreed
3.11.76	Traffic Regulation Orders and Temporary Traffic Regulation Orders	TRO enforcement – Traffic enforcement in Essex is primarily carried out by Essex Police for speed enforcement and enhancing road safety, and by Essex County Council for traffic-related services. Maintaining the TROs – The **7.3 Outline Construction Traffic Management PlanREP4-174]** Table 6.1 provides indicative timescales and responsibility for monitoring of/checking signage, vehicles and road network.	The TROs needs to be self enforcing through advanced warning signage and traffic management etc. Police have limited resources to carry out enforcement and the scheme is very large. Therefore, the TROS need to be self-enforcing through advanced warning signage and traffic management. This should be included in the CTMP.	Under Discussion
3.11.77	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The diversion routes have been identified following typical road closure procedures, where diversion routes are of a same or better standard than that to be closed in terms of alignment, carriageway width, height and weight restrictions.	If the weak structures have not been reviewed, we would suggest this is undertaken through our Structures Team to ensure there are no issues with additional traffic using the diversion routes This is on the basis that the diversion route is part of the TTRO Schedule which is to be agreed through the DCO Examination. .	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Note diversion routes should be based on ECC's functional route hierarchy set out in the Essex Traffic Management Strategy.	
3.11.78	Traffic Regulation Orders and Temporary Traffic Regulation Orders	National Grid will engage with ECC regarding a proposed mechanism described by ECC in the **Local Impact ReportREP1-161]** for reviewing road closure diversion routes. Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison of the **7.3 Outline Construction Traffic Management PlanREP4-174]** references use and adherence of Local Highway Authority Permit Schemes, in order to best coordinate the street works required for the Project.	ECC welcome further engagement on this point.	Under Discussion
3.11.80	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA StrategyAPP-334]** sets out the reasoning behind decisions for the preliminary designs, being based on 85th percentile speed survey data, site-specific constraints and highway safety considerations together with other measures in combination to determine the suitable design speeds as listed with Schedule 13 of the **3.1 Draft Development Consent OrderREP4-037]** for TRO speed restrictions.	The response from the Applicant is agreed on the basis that the designs use 85th percentile speed data or the existing speed limit.	Agreed
3.11.81	Highway Mitigation Design on National Highways Infrastructure	Further to Matter **ID 3.11.69** (Highway Mitigation Design), it has been identified that the A120(E) / Bentley Road junction (described in Section 5.9 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**) impacts primarily upon the	ECC would expect input into the design but accept that National Highways would be the overseeing Organisation.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Strategic Road Network (SRN) managed by National Highways. On the basis that this proposed mitigation impacts principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.		
3.11.82	Construction Access Design on National Highways Infrastructure	Further to Matter **ID 3.11.68** (Construction Access and Crossover Design), it has been identified that bellmouth TB-B059 off the A120 Colchester Road east of Coggeshall (described in Section 5.9 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this access is proposed to be taken directly from the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.	Agreed	Agreed
3.11.83	Proposed Highway Mitigation Design on Wick Lane	With regards to the safety concerns raised, we propose to install a set of 4-way traffic lights to manage construction traffic joining the public highway. This will be located; 1. On the haul road at the junction with Wick Lane, 2. On Wick Lane at the junction with the Haul road, 3. On Lodge Lane at the junction with Wick Lane, and	As set out in ECC's Responses to ExQ1, comments on the Applicant's draft itinerary for the ASI & comments on any further information or submissions received by deadline 2 ([EP3-077] to date, ECC consider the safe use of Wick Lane by construction traffic has not been demonstrated. The position of the Highway Authority is that Wick Lane should not therefore be used by construction traffic. Due to the constraints in both width and alignment of Wick Lane this is not something that in the opinion of	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		4. On Wick Lane at Ardleigh reservoir bridge. The decision was taken to use a traffic management solution instead of widening the lane, due to the poor forward visibility and the additional vegetation removal and land take outside of the Essex CC ownership. Our assessment of the impact of the traffic lights on movements indicates that with a 96-second cycle time, predicted queues at either end are expected to remain below 5 PCUs (Passenger Car Units), indicating sufficient capacity for the proposed construction and existing flows. This is below the limits stated within the Traffic Signs Manual Chapter 8. National Grid has undertaken a Stage 1 Road Safety Audit (RSA) on the proposals. The Local Highway Authority (Essex CC) has reviewed the Stage 1 RSA and has responded that it is content that the proposals are safe. We note Essex's concerns at this location. The Applicant's appointed Main Works Contractor is undertaking a more detailed assessment at this location. They will consider additional options as suggested by Essex County Council and will continue to engage with them on this matter.	the Highway Authority can be deferred for further consider post DCO.	
3.11.84	Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road	The widening scheme relating to Ardleigh Road referenced by Essex County Council is, as stated, intended to facilitate both construction and operational access to the proposed East Anglia Connection Node (EACN) Substation. The section of Ardleigh	Details still outstanding – for example, ground conditions (existing construction of Bentley Road), and remote cycle way provision (maintenance issues),	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Road which would be impacted by the proposals is shown in **7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section CREP4-172].** The operational requirement for retaining the full proposed width of the carriageway is based on the need to maintain a route suitable for the Transformer Delivery Abnormal Indivisible Load (AIL) (as set out under **7.3 Outline Construction Traffic Management Plan - Appendix A - AIL StrategyAPP-310]**) in order to facilitate potential future delivery if a 'secured event' were to occur during the operational life of the proposed substation under the Natinal Electricity Transmission System Security and Quality of Supply Standard, as noted in paragraph 2.7.12 of **7.11 Transport AssessmentAPP-333]**. In developing the proposed access strategy, the Applicant considered a number of access options for the proposed EACN Substation. A summary of options is included within Table 3.19 of **6.3 Environmental Statement Chapter 3 – AlternativesAPP-127]**. The Applicant is aware of concerns expressed by Essex County Council with respect to the permanent operational arrangement of this widened section of Ardleigh Road. The Applicant will continue to engage with Essex County Council, and other relevant stakeholders, with a view to proposing suitable measures to address the noted operational	Awaiting response following RSA, Designer's Response and ECC comments. ***Updated position February 2026:*** ECC require a commitment in the CTMP that a comprehensive investigation of the construction of Bentley Road will be undertaken by the Contractor to inform the subsequent detailed design for the works on Bentley Road. Our concern is whether there is sufficient depth of construction in the existing carriageway for the widening works to tie into, and that it can accommodate the volume of construction traffic. ECC's position is set out in the Deadline 3 submission at (p8 under Article 18)**REP3-077]** in relation to maintenance issues where multiple NSIPs will be using and potentially maintaining the infrastructure installed on Bentley Road and Ardleigh Road. For clarity this is replicated below: • ECC would like to see evidence that discussions have been happening with the other DCOs Applicants. ECC has previously highlighted this point as something that ECC is concerned with and would like to have reassurance that some form of collaborative agreement is in place between the windfarms and Norwich to Tilbury. ECC's position in relation to ensuring ground condition surveys are undertaken for Bentley Road is that a commitment is required in the CTMP. Suggested text has been included as	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		concerns in this area. The option of increasing the permanent speed limit reduction along Ardleigh Road from 30 mph to 40 mph is being explored as a modification to the Development Consent Order application. Should residual risks be identified following this increase, the Applicant shall, through future engagement with the Local Highway Authority at detailed design, consider implementing permanent highway features to safely promote self-enforcement of the reduced speed limit, whilst not impeding use of the access route by the necessary design vehicles. The two existing Public Rights of Way (PRoWs) that cross the permanent private access road between Bentley Road and Ardleigh Road cross the access road at an angle. The intention is therefore for them to be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The sections of the PRoWs to be permanently stopped up, together with the proposed alignments of their associated diversions, are shown on the **2.5 Access, Rights of Way and Public Rights of Navigation PlansAPP-033 to APP-040, REP4-019 and REP4-020]**. As detailed design progresses, the precise alignment, length and specification of the permanent diversions and crossing will be developed in consultation with the Local Highway Authority PRoW Officer, and any resulting proposals would be in	part of the response to the Inspector's Questions (Q1). For clarity this is replicated below: • "Locations such as but not limited to Bentley Road, Ardleigh (Essex) that are proposed to be permanently provided will require a comprehensive investigation of the construction of the carriageway to inform the subsequent detailed design of the works." Further discussions on Ardleigh Road are ongoing as concerns remain about the proposed design.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		accordance with appropriate and relevant design standards.		
Abnormal Indivisible Load (AIL) Access				
3.11.85	Abnormal Indivisible Load (AIL) Access Approach	The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within Section 5 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]** and further detailed within the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access StrategyAPP-310]**. A draft version of the AIL Access Strategy was shared with Essex County Council in March 2025. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development. National Grid held a Traffic and Transport Working Group Meeting following the closure of the targeted consultations. Updates were provided relating to engagement on AILS, PRoWS and highways modelling.	Principle of using designated routes on the local road network is agreed. However, details to be agreed.	Agreed
3.11.86	Abnormal Indivisible Load (AIL) Access Routes	Routes proposed to be utilised by AILs are shown in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy**)**APP-310]**. These have been developed following consultations with Essex County Council. As part of these consultations, draft route	Ongoing discussions with respect to ongoing structural investigations. ECC provided initial comments during informal consultation period on dwg file provided in terms of tracking: H14-AIL1 wheel tracking appears to overrun edge of carriageway A120 RAB; H17 – AIL 1 wheel tracking overruns island on Pattricks Junction A120; confirmation	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		information was shared in July 2024 and April 2025. National Grid will continue to engage with Essex County Council on the proposed AIL access routes, including with respect to the ongoing structural investigations.	on missing x ref (x-OS TL8122) Drawings showing AIL tracking as pdf version have been requested for ECC colleagues to review.	
3.11.87	Abnormal Indivisible Load (AIL) Access Routes	The Applicant has engaged with National Highways on the proposed routes, who have provided confirmation that the three structures listed have weight restrictions imposed, but they are above the anticipated weight of the Cable Drum AIL delivery vehicle (104 t), meaning Cable Drum and Large Mobile Crane AIL access is permitted. Therefore, the Applicant does not envisage running AIL routes through Colchester Town Centre.	Position from Local Impact Report: The AIL Strategy shows routes using the A12 strategic highway network and confirms National Grid are in discussions with National Highways. ECC have not been party to these discussions or with other stakeholders on the routes provided, save for the views given based on discussions with Essex Police above. However, it is understood that National Highways have restrictions on the A12 in the Colchester area at three locations – i) over the rail line north of A12, J27; ii) the bridge connecting the two roundabouts at the interchange of A12, J28; and iii) A120 slip road bridge over the A12. ECC is concerned that if the A12 cannot be used for the AILs then the Applicant may put forward a route through Colchester Town Centre. ECC would strongly oppose this route being used due to the level of disruption through the town and surrounding highway network. This item is agreed on the basis of the applicant's confirmation that the National Highways structures do not cause issues for delivering Cable Drums and Large Mobile	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Cranes and there is not a proposal for using Colchester Town Centre.	
3.11.88	Abnormal Indivisible Load (AIL) Structural Investigations	The Contractor is currently undertaking detailed structural assessments along the selected AIL routes supported by their haulage specialist. This is dependent on the availability and adequacy of existing asset records. The Contractor is aiming to complete this by the end of the Examination process, assuming all relevant information is provided from the asset owners in a timely manner. However, this will only prove the structures are acceptable at the time of the assessment and identify any mitigations required. A further review will be required closer to the planned and agreed movement schedule to ensure the ALs are still suitable.	Ongoing discussions over feasibility with respect to structural investigations.	Under Discussion
3.11.89	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The locations of highway mitigations along proposed AIL Routes together with summary details for each location are set out within the **7.3 Outline Construction Traffic Management Plan - Appendix C - Guide to the Plans and Master Key PlanAPP-312]** and the **7.3 Outline Construction Traffic Management Plan – Appendix C - Indicative Highway Mitigation Plans - Sections A to HAPP-313 to APP-320, REP4-172 and REP4-173].** RSA1 audits have not been undertaken specifically for proposed AIL Routes in the preliminary design stage, and only undertaken on Primary Access Routes and at locations for	It is accepted that RSAs will occur for the AIL Routes for detailed design. However, ECC believe further discussion is required to understand the implications if the proposed AIL route that is set out in the DCO is deemed unsuitable following detailed review.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		site access points, crossing points or highway mitigation locations. Further development of the detailed design is to be undertaken, and some proposed AIL Route locations may be subject to associated stages of road safety audit. The detailed design proposals will require dialogue, approval/acceptance from the Local Highway Authority.		
3.11.90	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	Vehicle tracking swept-paths in preliminary design for A131 Beualieu Parkway at its roundabout with Loverose Way indicates minimal impact at this location, with possible overrun of the AIL vehicle body over outer grass verge areas. The development of detailed design stage would confirm whether any impacts are anticipated in this location, and as defined within DMRB GG119, a RSA may not be required if there are no physical changes to the existing highway infrastructure. Any requirements here will be subject to dialogue and approval from the LHA.	It is accepted that this is dealt with at Detailed Design Stage. However, we would like to discuss the constraints identified in the AIL tracking provided to ECC.	
3.11.91	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant is committed to minimising disruption on local highway networks and acknowledges the need to provide advance warning of works in areas that may be impacted by road closures relating to construction traffic. Detailed in paragraph 5.4.23 of the **7.3 Outline Construction Traffic Management PlanREP4-174]**, signs are proposed on sections of the Major Road Network, Strategic Road Network and Primary Access Routes which may be subject to	Detail and discussion required regarding: • VMS boards at key locations • Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		temporary traffic congestion and delay. The proposal to use Variable Messaging Sign (VMS) as part of this communication strategy is something the Applicant would welcome further discussion on with the relevant Local Highway Authorities. As noted in Section 6.5 of **7.3 Outline Construction Traffic Management PlanREP4-174]**, members of the community and local businesses will be kept informed regularly of the works through active community liaison. Section 3.3 of the **7.3 Outline Construction Traffic Management PlanREP4-174]** sets out the expectation of the Main Works Contractor for community engagement and public information sharing during construction. The Main Works Contractor(s) will implement a system to provide information to local residents and occupiers about the works. A community relations team will be appointed to provide dedicated community relations and external communication support during construction. The community relations team will maintain a Project website, which will act as a central source of information for the general public.		
3.11.92	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The indicative AIL movements set out in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access StrategyAPP-310]** are to be reviewed and updated in the detailed design process undertaken by the Main Works Contractor(s). It is expected that the Main Works Contractor(s)	Agreed	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		will continue liaison with the Local Highway Authorities and key stakeholders on AIL management. **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access StrategyAPP-310]** details that the Electronic Service Delivery for Abnormal Loads (ESDAL) system will be used to monitor and notifications be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible. As a general rule, to minimise disruption, AIL movements will be scheduled outside of peak traffic times, and in line with embargo times. The cumulative impact associated with AIL assessment would be mitigated by the use of the ESDAL system to manage any impact on the operation of the network. AILs would operate outside of peak hours and have therefore not been assessed within the **7.11 Transport AssessmentAPP-333]**. The assessment within **6.16 Environmental Statement Chapter 16 - Traffic and TransportAPP-271]** did not include AILs as these movements did not occur within the worst-case peak construction period identified within the trip generation. The Applicant notes the concerns raised by Essex County Council. The Contractor will liaise with the Local Highway Authority and		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Essex Police to confirm the AIL delivery routes and escorting requirements.		
3.11.93	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant acknowledges Essex County Council's summary of matters and will take it into account during forthcoming discussions with Essex County Council on recovering appropriate costs through a Planning Performance Agreement (PPA).	PPA costs to be agreed	Under Discussion

3.12 Public Rights of Way (PRoW)

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
PRoW Assessment Chapter				
3.12.1	PRoW Separate Chapter	As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the Environmental Statement (ES). Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative ES chapter. Note that an **7.6 Outline Public Rights of Way Management PlanREP4-178]** has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project.	The Applicant's position is noted. No further comment	Agreed
3.12.2	Types of PRoW	The Applicant reviewed the presence of routes with and without legal status whilst preparing the **7.6 Outline Public Rights of Way Management PlanREP4-178]** and impacts are identified separately for each type of Right of Way, thus distinguishing between their legal status. The review concluded that there were no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway.	Having reviewed the Applicants confirmation that there are no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway, ECC has no further comments and considers this matter can be moved to agreed.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.12.3	Proposed Management Regime Approach	The Applicant confirms that, should detailed design identify the need for any additional PRoW to be permanently stopped-up, the Applicant will continue to engage with Essex County Council to consider appropriate mitigation in line with the principles set out in the **7.6 Outline Public Rights of Way Management PlanREP4-178]** and the process for change detailed in its Section 7. The Applicant confirms that where Public Rights of Way (PRoWs) are managed on their existing alignment, or diverted, public access will be maintained throughout construction in accordance with the **7.6 Outline Public Rights of Way Management PlanREP4-178].** However, the **7.6 Outline Public Rights of Way Management PlanREP4-178]** also notes that, at locations where PRoWs interact with haul roads or certain construction activities, temporary holding of PRoW users, or management of crossings, may be required to ensure safety. Site-specific management measures and any temporary diversions will be developed by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan. The final PRoW Management Plan will be submitted to, and approved by, the Local Planning Authority.	Further detail is required throughout several sections of the PMP specifically on speed limits, driver inductions, signage and maintenance of temporary routes. ECC considers amendments are required to be made to the PMP together with clear commitments incorporated that allow the LHA to manage the PROW and customer engagement during the construction period. ECC notes a revised PROW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.12.4	Proposed Management Regime Approach	With regard to bridleways, the Applicant acknowledges discussions relating to appropriate widths where diversions are required. Following enagement with Local Highway Authority PRoW Officers, the **7.6 Outline Public Rights of Way Management PlanREP4-178]** notes that bridleways which are constrained on both sides should be a minimum of 4 metres wide between fencing or other such constraint, to allow sufficient width for horses to turn around.	The provision of 4m wide routes where bridleways need to be diverted or fenced adjacent to haul roads has been included in the PRoW Management Plan. ECC has no further comment and considers this issue can now be moved to agreed ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed
3.12.5	Proposed Management Regime Approach	The Applicant notes this comment (4.5.86 to 4.5.88 of **the Local Impact ReportREP1-161]**) and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.	ECC welcomes ongoing discussion with Applicant on the extent of mitigation required for PROW interaction with the adopted highway	Under Discussion
3.12.6	Routes with Public Access Affected by the Proposed Development	Routes with public access affected by the proposed development are shown in the **2.5 Access, Rights of Way and Public Rights of Navigation Plans Section A-HAPP-033 to APP-040, REP4-019 and REP4-020]**. Details of proposed management measures for each impacted route are shown in Section 4 of the **7.6 Outline Public Rights of Way Management PlanREP4-178].** These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.12.3).	They have published the plans now and ECC can see that the management measures are suitably identified on each PROW. ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.12.7	Reinstatement Approach	All PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with Essex County Council PRoW Officers as well as impacted landowner(s). This is set out in Section 6 of the **7.6 Outline Public Rights of Way Management PlanREP4-178].**	On the basis that all PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken, ECC has no further comment and is of the opinion this matter can be agreed. ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed

3.13 Cumulative Effects

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.13.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy ContextAPP-126]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	ECC would refer to its Relevant Representation submitted 27 November 2025 **[RR-1083]** and it's Local Impact Report **[REP1-161]** It is noted that the Applicant has confirmed they will liaise with other developments (notably North Falls, Five Estuaries and Lower Thames Crossing) likely to be taking place at the same time as Norwich to Tilbury to reduce cumulative impacts. Furthermore, ECC expects the Applicant to continue to proactively undertake reviews of the planning registers and engage with any emerging projects.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative EffectsAPP-281]**, in accordance with the agreed methodology in the **6.19 Scoping ReportAPP-288 – APP-296]** and **6.20 Scoping OpinionAPP-297],** including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors because of the Project. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate).	ECC requires the commitment form the Applicant to in join and positively engage with a Developer's Forum to be set up by ECC with key members of the other NSIP Teams as well as other Strategic Site Teams, alongside Local Highway Authority and Planning Authority participation. Further information on the detailed build programme will be required for the various stages of the construction through the Construction Management Plan which will be fed into from the Developer's Forum.	
EIA – Approach and Methods				
3.13.2	Study area	The study area was agreed through the EIA **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.13.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the **6.19 Scoping ReportAPP-288] toAPP-296]** and **6.20 Scoping OpinionAPP-297]** received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.13.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**. The key parameters and assumptions presented are considered appropriate. National Grid has provided a response to this matter at Deadline 1 through the relevant representations process **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023]**.	Further information is required on a number of proposed aspects as set out in ECC's response to the targeted consultation and its Relevant Representation submitted 27 November 2025 **[RR-1083]**. In particular, there are a number or access point and routes that are not currently supported. This is the subject of on-going discussions.	Under Discussion
EIA – Baseline Conditions				
3.13.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the **Environmental Statement Chapters 6 to 16APP-138 to APP-280]**. The baseline conditions and receptors presented are considered appropriate.	This is the subject of on-going discussions.	Under Discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.13.7	Embedded mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within **Environmental Statement Chapters 6 to 16APP-138 to APP-280]**. Embedded	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4. Further discussions are required on a range of issues to ensure necessary mitigation and	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		mitigation measures, designed as an inherent part of the Project are therefore set out in **Environmental Statement Chapters 6 to 16APP-138 to APP-280]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023].**	compensation is agreed and secured appropriately.	
3.13.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within **Environmental Statement Chapters 6 to 16APP-138 to APP-280]**. Standard mitigation measures during construction are summarised in **Environmental Statement Chapters 6 to 16APP-138 to APP-280]** and set out in **7.2 Outline Code of Construction PracticeREP4-164]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023].**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4.. Further discussions are required on a range of issues to ensure necessary mitigation and compensation is agreed and secured appropriately.	Under Discussion
3.13.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4.. Further discussions are required on a range of	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response UpdateREP4-163]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023].**	issues to ensure necessary mitigation and compensation is agreed and secured appropriately.	
EIA – Assessment Conclusions				
3.13.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response UpdateREP4-163]**. The assessment of effects during construction presented is considered appropriate. National Grid provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant RepresentationsREP2-023].**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4. ECC has concerns regarding the effect of construction traffic on the County's highway network and cumulative noise and environmental impacts. . ECC is also concerned with the cumulative noise and environmental impacts arising from these developments. Taken together, especially in the Tendring area, but all along the route, the proposals have the potential to lead to significant adverse effects on communities and the environment. It is crucial that respite is offered to the communities affected by the development through reasonable working hours and construction traffic management. ECC is therefore seeking substantially better controls within the Development Consent Order and the	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			Management Plans to ensure this respite is secured. In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages for landscape compensation and would welcome continued engagement on this matter. A particular concern is in relation to the effect of construction traffic on the County's highway network. Minimal information is available concerning the development programme and timing for this project and how this relates to various other projects. It will be important for there to be coordination between ECC and all developers / key stakeholders for the effect on local communities to be minimised. This is addressed in more detail below within the 'Local Highway Impact' section.	
3.13.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response UpdateREP4-163]**. The assessment of effects	In the absence of information, it is difficult to confirm the acceptability of the effects during operation (and maintenance), but it is recognised on-going discussions seek to resolve these issues.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		during operation (and maintenance) presented is considered appropriate. Further discussions will take place following additional information from ECC.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.13.12	Outline CoCP	**7.2 Outline Code of Construction PracticeREP4-164]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative EffectsAPP-281]** and is appropriate for managing construction impacts from the Project.	ECC provided a detailed section within its Local Impact Report regarding Management Plans and will continue to review and provide commentary accordingly through submissions to the Examination on further revisions of Management Plans submitted.	Under Discussion
Other matters as required				
3.13.13	Cumulative Impacts	The intra-cumulative assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** assessed the impacts on common receptors within **Environmental Statement Chapters 6 to 16APP-138 to APP-280]** in accordance with the agreed methodology in the **6.19 Scoping ReportAPP-288 - 296**] and **6.20 Scoping OpinionAPP-297]**. Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative EffectsAPP-281]**, in accordance with the agreed methodology in the **6.19 Scoping ReportAPP-288 – APP-296]** and **6.20 Scoping OpinionAPP-297]**, including North	Cumulative impacts are clearly one of the key principle issues in the Examination. ECC is aware of a significant number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula and other NSIP schemes dependent on Norwich to Tilbury). Three NSIPs will already interact in concentrated ways in specific places in Essex, which could be exacerbated by a fourth NSIP. As set out across this response, the Norwich to Tilbury project is a catalyst and has the potential to give rise to intra-project cumulative effects in addition to the effects arising from other strategic development projects. The cumulative effect needs to be mitigated and compensated and further discussions are required with the Applicant.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors as a result of the Project. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025; however, since the 1 April 2025 the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. An assessment of inter-project cumulative effects between the Project and the Tarchon Interconnector Project, as well as an assessment of inter-project cumulative effects from clusters of developments, including from the Tarchon Interconnector project, has been undertaken, and is presented in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]** (see ID DCO15). In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of their respective development consent application.		

3.14 Development Consent Order

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

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the **3.1 Draft Development Consent OrderREP3-004].**

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.14.1	DCO Requirements - Interpretation	The Applicant notes the Council's request for the definition of "reinstatement planting" to distinguish between replacement planting and what constitutes mitigation and compensation planting, but does not agree that there is any need for terms to be distinguished within the definition of reinstatement, as the definition already refers back to the Outline (or final) Landscape and Ecological Management Plan where necessary terms are explained. The definition mirrors the definition in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Requirement 1 - Interpretation The definition of reinstatement planting needs to distinguish between replacement planting and what constitutes mitigation and compensation planting.	Not Agreed
3.14.2	DCO Requirements – Stages of authorised development	The Applicant has updated references to "days" to become references to "business days" throughout **3.1 Draft DCOREP4-037].** However, it is not appropriate to do a straight swap in all instances, hence some of the numbers have also been adjusted to provide a 'business day' equivalent period. The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s)	Requirement 3 - Stages of authorised development Paragraph 3(1) should refer to "seven business days" to ensure consistency across the dDCO. ECC's view is that submissions under this article to the relevant planning authority should be for approval as opposed to notification given the scale of the project and potential for cumulative impacts arising from the project. ECC thus requests that paragraph 3(1) is amended and "for approval" is added at end of the text at 3(2).	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		within that period. However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout **3.1 Draft DCOREP4-037].** The Applicant cannot accept submissions under Requirement 3(2) being for approval by the relevant planning authority. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030. The Applicant does not consider it necessary to provide a timescale on prior notice under paragraph 3(a). The approach in **3.1 Draft DCO (Revision C)REP3-004]** is consistent with that in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. 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.	Paragraph 3(a) makes reference to "any revisions to the written scheme referred to in sub-paragraph (2) above must be submitted to the relevant planning authority in advance of the commencement of the stage of the authorised development to which the revisions relate" To avoid confusion and dispute, this paragraph should specify how far in advance this should be provided to the relevant planning authority to ensure they have due notice. In respect of Paragraph 4 and the reference to 28 days, ECC requests the term 'days' is defined with Requirement 1.	
3.14.3	DCO Requirements – Construction environmental management plans	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management PlanAPP-302]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management PlanREP4-170]** are provided as appendices of	ECC notes the explanation from the Applicant why it has not submitted a Construction Environment Management Plan ("CEMP"). However, the Bramford to Twinsted DCO requires a plan and here continues to be a lack of clarity that a Code of Construction Practice	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		7.2 Outline Code of Construction PracticeREP4-164] and includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO REP4-037]**. The outline management plans have been developed in consultation with a range of stakeholders. Relevant Stakeholders will be engaged with on the development of the full detailed versions of management plans and as part of our ongoing engagement with stakeholders we will review if others wish to be listed as consultees within this requirement. The Applicant notes the comment that additional consultees, such as the Local Highway Authority, should also be included in relation to the discharge of Requirement 4 (Construction management plans). The Applicant has updated **3.1 Draft DCO REP4-037]** to include the local highway authority and the relevant highway authority as a named consultee in the context of the strategic road network and the Environment Agency in respect of the code of construction practice.. Requirement 1(2) to the **3.1 Draft DCO REP4-037]** provides that '*Where under any of the requirements the approval or agreement of the relevant planning authority or the relevant*	(which is proposed) will provide the same sorts of protections as a CEMP. If it is intended to do so, in particular because of various outline plans appended to it, that should be made clear by the outline plans being listed. Furthermore, there are additional management plans which should be secured via this dDCO which needs to be addressed by the Applicant. Reference is made to "Natural England" within Paragraph 4(1) – however there are many stakeholders who should also be engaged in consultation on these management plans which should be reflected within this requirement, including the Local Highway Authority for example and ECC awaits the outcome of the Applicant's review and sight of the DCO at Deadline 5. At Paragraph 4(2), any agreement under this clause should be made in writing. Paragraph 4(3) should refer to the approved outline management plans. As above any agreement should be made in writing. Furthermore, there should be a record of how amendments and updates will be captured and recorded to ensure transparency. This matter must remain under discussion at this stage.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		highway authority is required, that approval or agreement must be given in writing.' It is not necessary to specify that this provision refers to the approved outline management plans as these are certified documents under Schedule 19. Appendix A of **1.3 Guide to the ApplicationREP4-002]** provides a master document list and revision history of all submission documents which are available on the Planning Inspectorate's website. Any documents submitted to discharge Requirements post-consent will be available on the relevant planning authority's website. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
3.14.4	DCO Requirements – Archaeology	**7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** provides detailed information on the reporting and publication process to be undertaken following the completion of fieldwork. This includes interim statements within six weeks of completing fieldwork at each site which will set out a programme of work and schedule for the completion of the Post-Excavation Assessment Report. The preparation of the Project archive, post-excavation assessment and subsequent analysis and publication phases would be undertaken in accordance with the DWSI(s), Historic England guidelines (Historic England,	Requirement 5 – Archaeology[The Requirement wording for Archaeology does not currently take into account the post-consent programme of archaeological trenching required, or secure timescales for delivery of the Post-Excavation Assessments. It is suggested that article 5(4) is replaced with the wording below and an additional point, 5(5), is included. This will give clarity for sign-off (our proposed condition 5(4)) and also provide reassurance of a robust mechanism for securing both the field and post-excavation works "5 (4) Intrusive site preparation works must not take place until an archaeological or geoarchaeological written scheme(s) of	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		2016a), and CIfA guidelines (CIfA 2014b; 2020; 2023a-f) and other relevant archaeological standards and national guidelines. The different phases would be completed within a set time frame following completion of fieldwork, as agreed between the Archaeological Contractor(s) and the Applicant in consultation with relevant Local Planning Authority Archaeological Advisors and, if relevant, Historic England. The measures within **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of InvestigationAPP-328]** are secured by Requirement 5 of **3.1 Draft Development Consent OrderREP4-037]**. The Applicant therefore does not consider it necessary to amend the wording of Requirement 5 to include post-excavation works. The Applicant has provided further detail on the discharge of requirement 5 in response to HE 1.51 in **8.9.1 Applicant's Responses to First Written QuestionsREP3-074]**. The Applicant has submitted **8.9.1 Applicant's Response to First Written Questions – Corrected Response to Question DCO 1.S8AS-090]**, comprising a discussion draft of Requirement 5 showing how it would appear should all amendments proposed by the host authorities and Historic England be accepted. The Applicant has updated **3.1 Draft Development Consent OrderREP4-037]** to incorporate a number of the host authorities' proposed changes in respect of archaeological	investigation in accordance with the outline written scheme(s) of investigation as appropriate has been submitted to and approved by the discharging authority in consultation with Historic England. The archaeological or geoarchaeological written scheme(s) of investigation required under this sub-paragraph must be implemented as approved. 5 (5) Unless otherwise agreed with the local planning authority. a) No later than one year following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment (PXA) for that site must be completed in accordance with the Written Scheme of Investigation and submitted to the local planning authority for approval. b) No later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated Project design for all applicable sites, must be submitted to the local planning authority for approval. The archaeological updated Project design must be produced in general accordance with the detailed Written Scheme of Investigation for each stage, include details of the scope of post-excavation analysis and publication and have regard to the site-specific research agendas set	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		evaluation and post-excavation works. The Applicant is currently considering the comments made in respect of intrusive site preparation works and will provide an update at Deadline 6.	out in the site-specific written schemes of investigation. c) Post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated Project design and provision made for the full archive to be submitted to the appropriate museum.	
3.14.5	DCO Requirements – Design and layout plans (elevations)	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft DCOREP4-037]** . As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of **3.1 Draft DCOREP4-037]** . The Applicant notes the Council's comments regarding concerns with the limits of deviation, but reiterates that the limits of deviation have been assessed as part of the Environmental Statement and therefore restrictions to the limits of deviation are not necessary. 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.	Requirement 6 – Design and layout plans (elevations) ECC remains concerned with the use of "general accordance" and the subjectivity that would be involved in the assessment of whether any materially new or materially different environmental effects from those identified in the environmental statement have occurred which informs "general accordance". No explicit consideration is given to how some areas may be more sensitive to departures than others. The ES generally assumes the pylons as in the midline of the Limits of Deviation shown on the work plans. If a pylon is subsequently moved within those limits of deviation and closer to a receptor, but also higher, then there is likely to be a negative impact on said receptor experience of the development hence the concerns regarding the term "general accordance" and the desire to restrict the limits of deviation expressed. ECC also considers that the host local planning authority should have a say in whether any changes from the design and layout plans give rise to any materially new or materially different	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			environmental effects from those identified in the environmental statement. As such, the wording of paragraph 6(2) should be updated: The authorised development will not be in substantial accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) in the opinion of the Local Planning Authority gives rise to any materially new or materially different effects… ECC considers this could operate by way of a prior approval process similar to that in effect for many areas of the TCPA regime.	
3.14.6	DCO Requirements – Construction hours	The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written QuestionsREP3-074]**. The Applicant considers the provision for start-up and close-down activities 1 hour either side of the core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation These activities do not typically involve the operation of heavy machinery, require HGV deliveries, or generate significant noise, dust, or vibration, and therefore are not nuisance generating activities. All activities taking place on-site remain subject to the application of best	ECC continues to express concern regarding the drafting of Requirement 7 relating Construction Hours. ECc has provided detailed commentary on respect of ExQ2 DCO 2.S10 on the what it considers to be more appropriate wording for this requirement. This includes opportunity for respite for affected communities, limiting works on Sundays and Bank Holidays. Without amendments to this requirement made responding to these concerns, this matter is not agreed.	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		practicable means and appropriate mitigation to manage noise and other environmental effects as set out in **7.2 Outline Code of Construction Practice[REP4-164]** . In respect of noise impacts, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 – Part 1: Noise28, and as detailed in Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** **[APP-256]**. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects as per commitment NV05 within Table 6.1 of **7.2 Outline Code of Construction PracticeREP4-164].** 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.		
3.14.7	DCO Requirements – Reinstatement schemes	The Applicant has updated the references in **3.1 Draft DCOREP4-037]** to refer to "former condition" instead of "former use". The Applicant felt that the use of "and appearance of the land" in the Council's proposed definition of "former use" would satisfy the tests of	Requirement 10 – Reinstatement schemes ECC notes the repeated reference to 'former use' within this part of the DCO and questions whether this should be defined to ensure that there is clarity around what is considered a 'former use' of a site. There needs to be clarity	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		precision and could potentially cause problems with compliance (for example if planting was required). The presence of underground cables affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanked requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	around who determines what the former use of a site, alongside any enforcement actions around this. It is therefore suggested that 'former use' is defined as "the condition and appearance of the land prior to the commencement of the development" Requirement 10(2) – ECC notes the exclusion from the reinstatement requirement of land within 10 metres of any underground cables. It would be helpful to clarify what will happen to this land.	
3.14.8	DCO Requirements – Decommissioning	Decommissioning has been scoped out of the Environmental Statement as per **6.20 Scoping OpinionAPP-297]** and the **3.1 Draft DCO REP4-037]** reflects this (in that the definition of 'maintain' in Article 2(1) allows for the removal of part, but not all, of the authorised development). The Applicant's position normally in relation to promotion of Development Consent Orders is that	Requirement 13 – Decommissioning ECC would welcome more detail around the decommissioning process, especially any impacts arising on communities and the local environment. There is an expectation for restoration to contribute to sustainable land stewardship, climate change mitigation and adaptation, biodiversity and environmental net gain through	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		decommissioning is not anticipated given the design life of the development and the continuing need for the transmission network to operate. However, all appropriate consents would be sought at the relevant time if decommissioning was in fact subsequently required in future. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	the delivery of natural GI. If the restoration proposal is to return the site to arable land it will need to a better grade than before and demonstrate how it will deliver sustainable land stewardship with potential to link to Landscape recovery. ECC would also wish to refer to its response to ExQ2 DCO 2.S12 in respect of decommissioning.	
3.14.9	DCO Requirements – Applications made under requirements	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. The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily	The process and timeframes across the DCO must be sufficient for the relevant local authority to consider, undertake the necessary checks, engage with relevant stakeholders and respond to such applications submitted to it. At Paragraph 1(1) LPA's are required to give notice of their decision on the discharge of requirements within 28 days. This is considered too short given the available resources and the processes involved in the discharge of Requirements, some of which will no doubt be complex and supported (properly) by a lot of detailed information. This period should be extended to at least 56 days. This is consistent with the statutory determination period for the discharge of conditions under the TCPA regime. In addition, at Paragraph 1(1)(b) where further information is required, the Clause should be altered from the day immediately following the date the information was supplied by the undertaker to the day after the receipt by the local planning authority of the further information.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		delayed by means outside the control of National Grid. 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. Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft DCO REP4-037]** 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. In any case, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure Essex County Council, and other relevant host authorities, are able to respond on programme.	ECC remains concerned with the timeframes offered by the Applicant in respect of the discharge of requirements. However, in light of the recent announcements regarding DESNZ's role as discharging authority, ECC would welcome a productive discussion with the Applicant and the ExA as necessary on how this requirement should be redrafted following this change.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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.		
3.14.10	DCO Requirements – Further information	Given the Project's status as a project of critical national importance, the Applicant considers five business days for the relevant discharging authority to request additional information to be proportionate and appropriate. The Applicant has updated **3.1 Draft DCOREP4-037]** to replace the five-day period for the request of further information to five 'business days' for consistency of terminology. This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21-day period for notification of further information requested by a requirement consultee with an equivalent period of 15 'business days'. Paragraph 2(4) of Schedule 4 to **3.1 Draft DCOREP4-037]** allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary. The Applicant expects to provide further information electronically, so the submission and receipt of the information is expected to occur at the same time in practical terms. It is	At Paragraph 2 (2), the timescale should be increased to at least seven business days consistent with that specified in the Bramford to Twinstead DCO. At Paragraph 2 (3) the timescales for the local planning authority to issue the consultation following the receipt of information / additional information should be increased to ten business days. In addition, the backstop date by which the relevant authority must notify the undertaker should be increased to ten business days after the 21-day consultation period or the receipt of the Requirement Consultees response requesting the need for additional information. This is to reflect the pressure on resources of likely required consultees and to the relevant authority having to seek an extension. The burden on LPA's could be further reduced if the Undertaker were to notify the Requirement Consultee directly at same time as LPA so ECC. suggests discussion with the Applicant as to how that could work. ECC is concerned about the process where the supplied information is not acceptable. While Schedule 4 paragraphs 2 and 3 deals with some aspects of that, it does not address circumstances where ECC only knows what further information is required once it has	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		therefore not anticipated that there is any merit in amending the drafting here. The Applicant notes the point raised on notification of consultees and has updated **3.1 Draft DCOREP4-037]** accordingly. The Applicant considers that the existing drafting provides appropriate flexibility, however it is unlikely that the two parties will find a mutually agreed position in respect to timescales, and therefore suggest this matter is moved to Not Agreed.	received comments from consultees. and does not address the issue. It is therefore suggested that: • In Schedule 4 Paragraph 2, replace," the relevant authority must, within 5 days of receipt of the application" with "the relevant authority must, within 21 days of receipt of the application; • In Schedule 4 Paragraph 3 delete "and in any event within 21 days of the receipt of the application" is deleted from Paragraph 3 of this Schedule.	
3.14.11	DCO Requirements - Fees	The Applicant has updated the proposed fee to align with the current national guidance in **3.1 Draft DCOREP4-037]**. In line with the approach taken on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, and the proposed entry into post-consent Planning Performance Agreements, the Applicant does not consider it necessary for refunds of application fees to be subject to any retention. The Applicant does not consider it appropriate to index link the application fee. Application fees for recently made development consent orders do not require indexation (see, for example, the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.	ECC is giving further consideration to what the specified fee at part 3(b) should be and its relationship to prescribed fees and any post consent PPA and will update the Applicant and the ExA as soon as practicable. The period within which the application has to be determined should be increased to 42 days, as should the period for the refund This more realistically reflects the processing time which will be needed to carry out the necessary consultation key consultees and for them to consider the submitted information which on a project of this scale will no doubt be extensive and detailed. This situation is further exacerbated by the number of DCO's may LPA's are currently having to process. Any refund of application fee should be subject to a 20% retention to cover the initial administration costs of processing the submission.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			The dDCO should clarify whether the fees will be index linked. ECC would refer to it's response to ExQ2 DCO 2.S13 regarding Fees. Due to the potential role of DESNZ, this matter must form part of discussions moving forward on how this detail in the DCO may need redrafting.	
3.14.12	DCO Requirements – Certified documents	The **7.2 Outline Code of Construction PracticeREP4-164]** secures a number of measures that would robustly control the construction and operation of the Project in terms of works to watercourses, land drainage, surface water drainage and pollution risks. It is therefore not considered necessary that the **7.9 Flood Risk AssessmentAPP-331]** becomes a certified document, however, the Applicant will continue to engage with ECC on this matter.	The Lead Local Flood Authority ("LLFA") is concerned that the dDCO, Draft Schedule of Requirements and Explanatory Memorandum do not highlight the existing flood risk, the need for managing said risk and/or the presence of overland flows. This issue is relevant for both pre and post construction. ECC suggests that the Flood Risk Assessment and the Surface Water Management Principles document be listed as 'CERTIFIED DOCUMENTS' of the DCO and that the Construction Environmental Management Plan is drafted to control works that affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants.	Under Discussion
3.14.13	DCO Requirements – Additional requirements	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. The Applicant has prepared drafting to be included in **3.1 Draft Development Consent Order** in relation to post-consent discharge	Given the scale and complexity of the project across multiple areas, ECC would encourage that the DCO requires the Applicant to maintain a 'Register of Requirements' to ensure ongoing fairness, public confidence and transparency. Additionally, to ensure the timeliness and efficiency of the discharge of requirements process this should include all relevant certified	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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.	plans and documents that will be required to undertake the assessment of the submitted requirement material. ECC would question whether in light of the announcement by DESNZ, whether there is any reconsideration of this matter. If not, this matter could be moved to not agreed.	
3.14.14	DCO Requirements – Additional requirements	The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by the Applicant to the local planning authorities along the Project route under s.106 of the Town and Country Planning Act 1990, relating to obligations designed to secure at least a 10% biodiversity net gain as part of the Project. As the Applicant intends to secure the BNG commitment via a unilateral undertaking, it is not considered a further commitment within **3.1 Draft DCOREP4-037]**is necessary.	A post-consent programme of ecological mitigation measures and a BNG delivery plan will both need to be secured through the dDCO Requirements. Ongoing discussions would be welcomed on this to reach an agreement on this important matter.	Under Discussion
3.14.15	DCO Requirements – Additional requirements	The Applicant notes the concern about the cumulative effects of the project with other NSIPs and other major infrastructure projects and will consider the request for a Developer's Forum and continue to engage with the local authorities accordingly.	To manage the cumulative impacts arising from this scheme, ECC is seeking the establishment of a Developers Forum. This should be in place to monitor and manage the impacts arising from this and other nationally and strategic developments in Essex. ECC would wish to see further commitments from the Applicant on this matter.	Under Discussion
3.14.16	DCO Requirements – Additional requirements	The Applicant has prepared **7.3 Outline Construction Traffic Management PlanREP4-174]** which includes details of proposed management and mitigation	There is a need for surveys to be carried out and mitigation agreed before the commencement of works for HGV parking. ECC recommends that this is either captured within an appropriate	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		measures associated with construction traffic, including Heavy Goods Vehicle (HGV) drivers not adhering to the agreed routes or HGVs drivers parking or waiting on the highway in inappropriate locations. With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to engage with the local authorities on this matter.	management plan, or through an additional requirement and would welcome discussions with the Applicant on this matter accordingly.	
3.14.17	DCO Requirements – Additional requirements	As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in **8.9.1 Applicant's Responses to First Written QuestionsREP3-074],** the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills PlanRevision 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 construction of the Project. The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement in an update to **3.1 Draft DCOREP4-037].**	ECC welcomes a requirement in the DCO which requires an Employment, Education, Skills and Supply Chain strategy to be submitted. ECC would recommend this is submitted to the relevant local authorities approval prior to commencement of construction as a mechanism to secure legacy benefits from the development. ECC has provided commentary to the Applicant on the Strategy. ECC would welcome further engagement with the Applicant on the detail within this strategy.	Under Discussion
3.14.18	DCO Requirements – Additional requirements	Mitigation measures for health and wellbeing will be secured via Requirement 7 (management plans) of **3.1 Draft DCOREP4-037]**, and there is no requirement for monitoring measures for health and wellbeing	The dDCO should include a standalone Health and Wellbeing mitigation strategy and a health and wellbeing monitoring plan.	Not Agreed

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and WellbeingAPP-192]**. 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.		
3.14.19	DCO Requirements – Additional requirements	The Applicant supports the delivery of Environmental Net Gain including Green Infrastructure and will consider whether there are any opportunities to deliver under enhancement. In relation to the addition of a requirement to monitor and report on BNG and Green Infrastructure delivery, **7.1 Biodiversity Net Gain ReportAPP-299]** includes a commitment to undertake monitoring for a period of 30 years with details to be set out in a habitat management and monitoring plan. **7.4 Outline Landscape and Ecological Management PlanREP3-030]** also provides for monitoring.	ECC recommends an additional requirement regarding a Green Infrastructure (GI) Strategy to address the alignment between measures set out in the OLEMP **[APP-321]** and BNG Report **[APP-299].** Additionally, the Environment Statement recommend other ecological enhancements not captured by the metric, such as bird and bat boxes and habitat piles. These enhancement and mitigation measure identified are instrumental in contributing to producing quality GI therefore all these GI threads should be carried through to detail stages of the application and secured through a suitably worded Requirement.	Under Discussion
3.14.20	DCO Requirements – Submissions for discharge of requirements	Those Requirements that require the submission of substantive documents specify the required content of these documents. In particular, any submissions under Requirement 4 must be in substantial accordance with the relevant outline management plan, which ensures that the relevant authorities are aware of the nature of the submission they will receive and which will support effective and efficient processing.	The content and quality of any submission for the discharge of requirements must be to an agreed standard to support efficient processing.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
Other matters as required				

3.15 Other Matters

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.15.1	Dunton Hills Garden Village Viability	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and have sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design.	ECC reserves its final position subject to the outcome of the Savills report into the impact of the proposal on the viability of the proposed development and the ability to support necessary affordable housing and infrastructure to support the creation of a sustainable community. ECC would reiterate its concern regarding the lack of any baseline assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely significant effects from those impacts to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		National Grid also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. National Grid continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the National Grid's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites. The Applicant can confirm that notwithstanding the statements in the LIRs, that the Project has considered DHGV during routeing and refinement of the alignment. The 2023 preferred draft alignment was amended to take forward a preference to follow the gas pipeline corridor (that runs along the eastern boundary of DHGV) for a greater distance, such that the overhead line would not introduce a new constraint in this location, having regard to DHGV. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with NPS EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules. The Applicant does not consider that the Project will result in any significant impact with regard to the viability of DHGV. The Applicant's position is that deliverability of DHGV is not prejudiced by the Project.	ECC refers to its Relevant Representation submission (27 November 2025) paragraphs 6.2.16-6.2.21) **[RR-1083]**. ECC commissioned Savills to investigate the impact of the pylons and overhead power lines on the planned viability and deliverability of the garden village development at Dunton Hills and specifically, the impacts of the N2T proposals on property prices and the Residential Gross Development Value (RGDV) of the proposed Dunton Hills Garden Village (DHGV) scheme. The report concludes that the introduction of overhead pylons is likely to have a material impact on residual land value with a reduction in the order of £17.5m to a policy compliant scheme. ECC will therefore be continuing to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the viability and deliverability of both, DHGV and emerging development proposals in Basildon Borough directly to the east Continued engagement and discussion would be welcomed.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.15.2	Climate Change	ECC comments are noted, and National Grid will continue to engage with ECC on this matter.	Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation. ECC would note there has been limited engagement with the Applicant on this topic to date.	Under Discussion
3.15.3	Green Infrastructure / BNG	For The Applicant's position on Biodiversity Net Gain, please refer to Section 3.13 'Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain' in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030]**	ECC places significant importance on protecting and enhancing green infrastructure, accessibility, and biodiversity net gain. There is no objections in principle to the relocation, alignment of pylons in several of the sections, where it reduces the removal of trees and reduce the impact on mature woodlands but ECC supports a strategy that seeks to maximise opportunity to reduce environmental impacts and for habitat retention, enhancement, and creation through the delivery of Green Infrastructure to meet the biodiversity net gain requirements and align with the Essex Local Nature Recovery Strategy objectives. Please refer to comments made in response to the 2024 statutory consultation and the 2025 targeted consultation. ECC recommends that landscape and BNG plans for Norwich to Tilbury NSIP be aligned with other regional projects (e.g. North Falls and Five Estuaries offshore wind farms) where the project crosses over such as ECAN, to support coherent habitat creation, reduce fragmentation, and strengthen GI and nature recovery delivery across the wider landscape. ECC requests detailed mapping showing how the project supports LNRS priorities and a robust	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			monitoring framework to ensure delivery of GI benefits over time.	
3.15.4	Removal of Obsolete Pylons	The Applicant welcomes ECC's support for the removal of existing lines and acknowledges the Council's encouragement to explore further opportunities to reduce cumulative visual impact of energy infrastructure.	ECC welcomes the proposal to remove a number of 132kV pylon lines operated by UK Power Networks and would encourage National Grid to continue to explore opportunities for N2T to facilitate the removal of further 132kV pylon lines operated by UK Power Networks, to reduce the cumulative visual impact of energy infrastructure, and compensate for the additional LSE to landscape and amenity of the proposed new 400kV power lines The Applicant must demonstrate a commitment to reducing cumulative visual impacts of energy infrastructure, possibly through agreed landscape compensation measures before ECC is able to agreed to this point in the SoCG	Under Discussion
3.15.5	Airfields	For The Applicant's position on Airfields, please refer to Section 3.17 'Safety and Security – Airfields in **8.8.2 Applicant's Comments on Local Impact ReportsREP2-030].**	ECC reserves its position on this issue pending the outcome of these discussions and confirmation regarding the impact on the future use of airfield across the country as highlighted in the response to the targeted consultation.	Under Discussion

4. Appendices

4.1 Appendix A Draft DCO wording

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

Table A.1 Essex County Council – Comments on the draft DCO

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Provisions to reflect Essex County Council's comments) to all the highways authorities and we await comments.	oversight, and collaboration between the local highway authority and the developer. From experience at the implementation stage, contractors welcome the 'business as usual' approach which is our standard practice rather than bespoke arrangements that neither the LHA or the contractor are familiar with.	
2	DCO Wording - Terminology	The use of "business days" rather than "calendar days" across the draft Development Consent Order is consistent with made development consent orders but the Applicant has considered the point and made appropriate amendments in 3.1 Draft Development Consent OrderREP3-004] submitted at Deadline 3. However, with the exception of Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders, the Applicant updated the 3.1 Draft Development Consent OrderREP3-004] to consistently use 'business day' timescales, to remove reference to 'discharging authority' and to update the definition of 'relevant authority'. The Applicant notes the Council's comments on the consistency of terminology and timings in relation to the Permit Scheme and TROs and is considering these points. The Environmental Permitting (England and Wales) Regulations 2016 is already included in Article 2 (Interpretation) as "the 2016 Regulations". The Energy Act 2004 is not referred to in the draft Development Consent Order and therefore does not need to be included in this article.	Part 1 Preliminary Article 2 – Interpretation **"Business days"**: ECC welcomes the change to "business days." The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it. It is further queried whether the Environmental Permitting (England and Wales) Regulations 2016 and the Energy Act 2004 should also be mentioned in this section. They are relevant to the dDCO "Pre-commencement operations". **"Pre-commencement operations":** ECC welcomes the inclusion of pre-commencement surveys of listed buildings in the list of pre commencement operations, as they have the potential to be impacted by vibration once the development commences. ECC maintains its concerns with the remainder of the definition of pre-	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The operations comprised in the definition of pre-commencement operations are either de minimis or have minimal potential for adverse impacts, and by virtue of Requirement 4 of the Order, must be carried out in accordance with the outline management plans. Indeed, they may, in some cases, need to be carried out in order to comply with pre-commencement requirements (for example, to inform assessments and proposals required to be submitted for approval) or to implement environmental mitigation or other measures required pursuant to European Protected Species licences. As noted in the **3.2 Explanatory MemorandumREP4-039],** the additional items contained in the definition of 'pre-commencement operations' beyond those in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are: • Listed building surveys – these have been included at the request of Essex County Council; • Protection works comprising utilities protection works or fencing and protection slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.	commencement operations in respect of works 'excluded from the commencement of development' and associated with the establishment of construction compounds. These operations are extensive and include temporary laydown areas and compounds and the creation of bell mouths all of which could necessitate the potential removal of trees and hedgerows in advance of any Requirement for a Vegetation Retention and Removal Plan being discharged. This is also of specific concern in respect of historic buildings where it is noted that specified pre-commencement operations could proceed without triggering necessary mitigation likely to be set out in the Requirements. While the submitted ES assumes that the excluded works and operations would be unlikely to have any significant environmental effects, ECC is of the opinion the effects of some of these works could have major impacts locally that need mitigating, or which could cumulatively give rise to significant effects needing mitigation. As a result, these works have the potential to be so significant as to give rise to materially new/different environmental effects which ought properly to be subject to further checks before being allowed to proceed. In light of this, ideally many operations (such as the establishment of construction compounds), should be excluded from the definition of pre-	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		• Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary laydown areas in addition to construction compounds. National Grid does not consider its inclusion to be materially beyond the scope already set out. • Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put the Applicant in a favourable position to deliver the Project by the target date. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement. The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the	commencement operations. If this is not acceptable, a compromise could be the addition of a tailpiece: 'those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority' ECC notes the Applicant's responses in **[REP 3-074]** to the ExA's questions at DCO 1.A8 and 1.A9. The Applicant has not engaged with ECC's central concern: that even if the operations sit within the broad envelope assessed in the ES, the cumulative effect of allowing extensive compound, laydown, bell-mouth, set-up, plant erection and (now) advertisement display works to proceed before any pre-commencement Requirements are discharged is significant in this rural and heritage-rich context. The list of pre-commencement operations in this dDCO goes materially further than the Bramford to Twinstead Order on which the Applicant otherwise relies (the Applicant itself accepts this). Reliance on Requirement 4(3) and on the offence of breach is no answer where the relevant planning authority has no opportunity to test whether the works as proposed in fact	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Applicant considers that the exclusion of these works and operations from the definition is appropriate. The Applicant does not consider it necessary or appropriate to include the Council's proposed tailpiece, since any failure to comply with a term of the DCO by the Applicant would be an offence. Furthermore, recently made DCOs do not include such a tailpiece.	remain within the assessed envelope. ECC's tailpiece would allow the LPA to flag where, in its view, a particular pre-commencement operation gives rise to a materially new or different environmental effect — which is precisely the situation the DCO ought to control. The 2030 programme cannot displace the planning tests of necessity, precision and enforceability. At a minimum the establishment of construction compounds should be removed from the definition of pre-commencement operations and the materially new/materially different effects safeguard added,	
3	DCO Wording - Maintain	In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network.	"Maintain" The definition of "maintain" includes a wide range of specified operations in relation to the authorised development, providing that as long as such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, these specified operations can take place without further consent. To provide clarity and avoid any dispute, the DCO should incorporate a mechanism for assessing and determining whether such maintenance works give rise to materially new/different environmental effects. As a result, the definition of 'maintain' be amended	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			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." ECC notes the Applicant's responses in **[REP 3-074]** at DCO 1.A6. The transmission licence duty is a duty to maintain the network. It does not provide any planning control over the form, scale or environmental effects of maintenance works. It is therefore no answer to ECC's concern, and on the Applicant's logic no grid DCO would ever need to safeguard against the environmental effects of maintenance, which cannot be correct. Self-policing through the offence of breach is not a substitute for an enforceable mechanism allowing the LPA to identify, before works are carried out, whether a particular operation falls within the envelope assessed in the ES. ECC's wording would only engage where there is a materially new or different effect, i.e. exactly the case that has not been assessed and where LPA control is most needed.	
3	DCO Wording – Relevant Planning Authority	Where local government reorganisation results in more than one successor authority across a current given area — as may well occur across Essex — the definition will automatically identify the correct authority	ECC notes National Grid's position and will reflect and respond accordingly in the next iteration of the SoCG	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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 Essex 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 proposed 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 definition already achieves and is therefore unnecessary. 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		

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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.		
4	DCO Wording – Outline Management Plans	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management PlanAPP-302**] **and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management PlanAPP-306]** are provided as appendices **of 7.2 Outline Code of Construction PracticeREP4-164]**. The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP); therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft Development Consent OrderREP4-037].** The term "Noise and Vibration Management Plan" is not used in the draft Development Consent Order, which is why it does not have a separate definition, however, the outline management plan is, as the Council has recognised, an appendix to the Code of Construction Practice and hence is controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order. As per the Noise and Vibration Management Plan, without express use of the named management plans, there is no purpose in providing definitions.	Omission of outline management plans The dDCO omits reference to outline management plans which were included in the B2T DCO, namely: an Outline Construction Environmental Management Plan. It also omits reference to an outline Noise and Vibration Management Plan (APP-306), and an outline Dust Management Plan (APP-304), both of which are envisaged in the Applicant's Environmental Statement (as appendices to the Code of Construction Practice, but worthy of separate definition in ECC's view, as these are seen as being absolutely necessary to protect enjoyed residential amenity). ECC notes the Applicant's responses in **[REP-074]** to DCO 1.A4 and 1.G3. The Bramford to Twinstead DCO, relied on by the Applicant as comparable precedent throughout its responses, requires a CEMP. The Applicant has not explained why a project of this much greater scale, route length and host authority footprint is said to	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			need different (and less) rather than more control. Requiring users of the dDCO to chase through the Code of Construction Practice and its eight appendices to identify the environmental controls on construction is the opposite of the precision and clarity expected of DCO drafting. A CEMP, NVMP and Dust Plan would each be readily definable in Article 2 and securable in Requirement 4. The Applicant's reliance on the statutory nuisance defence in Article 48 strengthens, not weakens, the case for a separately secured Noise and Vibration Management Plan: where the Article 48 defence is engaged, the LPA's primary control on noise impacts is the management plan regime, and that control should be unambiguous on the face of the DCO.	
5	DCO Wording - Interpretation	This term is already defined in Article 2 (Interpretation) of the draft Development Consent Order in the same way as it is defined in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	"Provisional Advance Authorisation" A definition of "provisional advance authorisation" (as per Reg 2 Traffic Management Permit Scheme Regs 2007) should be included in the dDCO to ensure consistency with other DCO, including the Bramford to Twinstead project.	Agreed.
6	DCO Wording – Development Consent etc. granted by the Order	In relation to the comment on Article 3(1), Article 3(8) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the **2.3 Works PlansAPP-017 – APP-024, REP4-015 and REP4-016],** subject to article 5 (limits of	Part 2 Principal Powers Article 3. Development consent etc. granted by the Order While Article 3(1) confirms that, subject to the provisions of the Order (including the	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		deviation) and to the Requirements. The Applicant does not consider any further clarification is required. Paragraph (7) specifies that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent that they are required by or incidental to the carrying out of the authorised development, as permitted by section 120(3) of the Act. There is precedent for this in the North Killingholme (Generating Station) Order 2014. Although this provision was removed from the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the scope of the power is not inconsistent with the works authorised in Schedule 1 (authorised development) and is clearly stated to apply for the purposes of the authorised development only. These precedents do not include a mechanism for assessing and addressing any materially new or materially different environmental effects and National Grid considers it appropriate to include this provision in this Order, without amendment, taking into consideration the scale and urgency of the Project.	Requirements) National Grid is granted development consent, the extent of the consented development should be clarified by the addition of "to be carried out within the Order limits" (as defined in the dDCO). This is so that the scope and limits of the development consent are clearly set out and reflect the development subject to the examination. Article 3(6) provides for the authorised development to include and permit the alteration, removal, clearance, refurbishment, reconstruction, decommissioning and demolition of any other building or other structure within the Order limits, to the extent that they relate to, are required by or are incidental to the carrying out of the authorised development. As this is not limited to the authorised development described in Schedule 1 (and "authorised development" is defined more broadly than that in Article 2), the dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from the development authorised in Article 3(6). ECC's amendment is precisely the kind of "on the face of it" clarification that prevents the user of the DCO needing to chase through cross-references to satisfy themselves of the territorial scope of the consent. The Applicant's response confirms the substance	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			is intended (the works must be within the Order limits) but resists making this express in Article 3(1). There is no good reason not to make a clarification that the Applicant accepts as accurate.	
7	DCO Wording - Maintenance	In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network. The request for an obligation on the Applicant to decommission part of the authorised development should it become obsolete is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system.	Article 4 4. Maintenance of authorised development As raised within Part 1 Preliminary, Article 2 – Interpretation, the scope of works permitted to maintain the authorised development is broad. The dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from such works. In addition, under this Article, there should be an 'in principle' obligation on the Undertaker to decommission (part of) the authorised works as and when they become obsolete due to improvements in technology or otherwise. ECC notes the Applicant's response in **REP3-074** at DCO1.A14. The transmission licence duty is again pressed into service as the answer to a discrete planning point that it does not address. The licence duty does not require decommissioning of obsolete works; if anything, it cuts the other way, since obsolete apparatus has no role in maintaining an efficient transmission system but may continue to occupy the land and have	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			ongoing landscape, ecology and amenity effects. Requirement 13 deals with decommissioning of the whole authorised development. ECC's point is different: an Article-level obligation to decommission individual elements that have become obsolete, securing for the LPAs and host communities that redundant infrastructure will not simply be left in situ. This amendment should be made in Article 4 and/or as a strengthened Requirement 13.	
8	DCO Wording – Limits of Deviation	The term 'lines and situations' is a commonly used and understood term in development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant does not consider that this term needs to be defined. The Applicant has addressed the Council's concerns on limits of deviation relating to sensitive receptors in the Historic Environment section in Chapter 4 of this document and so we do not repeat that here. The Applicant has provided its justification for a six metre upwards limit of deviation earlier in this document and does not repeat it here. In respect of the downwards limits of deviation, the Applicant considers there to be sufficient controls included in the outline management plans. The proposed drafting mirrors the drafting contained in Article 5 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Article 5. Limits of Deviation (LoD). ECC's position is set out below, but in summary ECC notes the Applicant's response at **[REP 3-074]** D1.A15-17 and accepts there is a difference of view here. They key issue is that the Applicant has not engaged with the detailed information and list of designated heritage assets at LIR §5.3.9 **[REP1-161]**. The Applicant's response asserts that justification is sufficient and repeats the Explanatory Memorandum text that ECC had already explained was inadequate. The point of LoD controls is precisely to give certainty in environmentally sensitive locations. A blanket 6 m vertical LoD across the entirety of the route, with an Article 5(4) discretion to depart even from that, leaves designated heritage assets in particular without the level of certainty they require. Where the Applicant says departure would be	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			exceptional, that should be reflected in the drafting through prior approval rather than left to discretion. ECC's previous submissions have set out why it considers that the LoD potentially have significant implications for how the development is experienced and in terms of its relationship to a variety of receptors. Firstly, at Article 5(1)(a) the term 'lines or situations' should be defined and added to list of definitions as the language lacks the clarity required given the importance and potential significance of this element of the DCO. The Limits of Deviation (LoD) allow for longitudinal and lateral deviation within the limits shown on the Work Plans, as well as vertical deviation. ECC notes that Article 5(1)(b)(i) would permit a vertical limit of deviation of 6 metres for the majority of the pylons. The Explanatory Memorandum (APP-057) explains that the rationale for the 6m limit is intended to provide a necessary but proportionate degree of flexibility. While noted, ECC is of the opinion this is a considerable extent of deviation, which as proposed, is not suitable for particularly sensitive areas such as nearby residential properties, in or nearby protected landscapes and nearby Grade 1 listed buildings, where the potential impact would potentially be greater than in other areas.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. […] These properties are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation. It is therefore proposed that the limit vertical deviation should be no more than 4 metres, (as per Bramford to Twinstead DCO, which is a more local, and thus more relevant development than the Yorkshire Green Energy Project, to which the Applicant refers in the Explanatory Memorandum). Anything beyond this 4 meters should require prior approval from the relevant planning authority.	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			At Article 5 (1)(d)(ii), the draft Order would also allow underground cables to be moved downwards to such extent as the undertaker considers necessary or convenient. While this may be acceptable in certain locations, other locations may be more sensitive due to ground conditions, water tables, archaeology or the cumulative effects of other structures being constructed. In certain defined locations (which should be discussed and agreed with the district authorities) therefore; the limit of deviation downwards should be restricted unless otherwise agreed by the local planning authority. This concern also extends to downward deviation permitted under Article 5 (3)(b). The proposed level of deviation within Article 5(3)(a) allows permanent above ground structures, erections and apparatus forming part of the authorised development, including substations, converter stations and cable sealing end compounds to be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans. This is not appropriate in designated sensitive areas, where this provision needs to be reduced. These sensitive areas must be discussed and agreed between the Applicant and all relevant authorities. In this regard, it is suggested for those designated locations, a	

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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. In developing the Order limits and drafting this provision and its associated Schedule 5, the Applicant has sought to identify all streets within which works would be necessary and has included those within the Order limits. However, to accommodate the situation where other works potentially outwith the Order limits are required, the Article as drafted allows for this. Where that scenario occurs, the Applicant's expectation is that planning permission (and indeed any further ancillary consents) will be required where works to be undertaken within any part of the highway outside of the Order limits comprise development within the meaning of Section 55 of the Town and Country Planning Act 1990. However, it would not be appropriate for the draft Development Consent Order to attempt to address all such eventualities (especially those which are already controlled as a matter of general planning law) and, particularly, to prescribe steps to be taken in respect of operations outside of the Order limits.	time period in the Bramford to Twinstead DCO, extensions of time have been needed. Further clarity is required on the process for works to take place outside the Order limits as referenced in Article 11 (2). ECC's concern is that the assessment of the works is based on the Order limits and anything beyond that will not have been reviewed as part of the DCO process. **Time periods overall**: Articles 11(3), 14(5), 17(2), 20(9), 49 and 50 all raise the same issue with the decision-making/deemed consent period. ECC notes the Applicant's response in **[REP 3-074]** and reference to the £7 million per day delay figure. This is a programme-wide figure for late energisation; it is not a credible justification for setting decision periods that, if missed, trigger deemed consent. The risk to the programme arising from a 35-day or 42-day decision period is materially less than the risk to environmental outcomes arising from deemed consent on inadequate review.	
10	DCO Wording – Application of	National Grid has had regard to feedback received from host authorities and the Examining Authority both on	Article 12. Application of Permit Schemes	Under Discussion

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			up new processes with tighter deadlines will provide a more streamlined approach and collaborative working. It is therefore requested that the timescales for the TTROs are altered to reflect ECC's standard timescales for the Permit Scheme and that the wording reflects that the Temporary Traffic Regulation Order is part of the Permit Scheme. ECC notes the Applicant's response at [**REP 3-074]** at DCO 1.A21. The Article 12(8) amendment addresses a different concern (avoiding parallel appeals) and not the timing alignment ECC asked for. ECC's point remains that the TTRO and temporary closure provisions, as drafted, do not align with the permit and PAA regimes that the same works will engage in practice. That will create operational and legal friction at the discharge stage. Bare "acknowledgement" of ECC's position is not engagement. The Applicant has not addressed the substance of ECC's concern.	
11	DCO Wording – Temporary closure of streets and public rights of way	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a	Article 16 Temporary closure of streets and public rights of way ECC do not accept the 28-day timescale as noted at Article 16(8) in relation to a street authority failing to respond to an application for consent. This is on the basis that a Temporary Traffic Regulation Order for temporary closure of streets would be required and as already highlighted above	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. The Applicant acknowledges that closures to streets and public rights of way can be disruptive to regular users. However, ECC will appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary closure. Some temporary closures will be very short, whilst others may need to be slightly longer. 7.3 Outline Construction Traffic Management PlanAPP-309], which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out further details on these temporary closures.	(under Article 12) is intrinsic within the Permit Scheme which takes 3 months to process. The Temporary Traffic Regulation Order for public rights of way would also require up to 3 months to process. It has to be acknowledged that any closure of access will be difficult for residents – especially where the access is being used for a site compound which could be situated somewhere else/ or where it is for a vague/open-ended period. It is therefore requested that the length of time for a temporary closure is specified in the dDCO. With reference to Art 16 (6), there have been discussions through the PRoW Management Plan around providing 4m wide routes for bridleways which may be a betterment to existing in some cases - however, this is because the horses need space to turn due to spooking associated with the construction works. In effect this is mitigation. This clause is potentially at odds with this 4m requirement and as such should be reworded	

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The wording of Article 16(6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC.		
12	DCO Wording – Construction alteration and maintenance of streets and other structures	Article 18(1) and (2) each include an "unless otherwise agreed with the street authority" caveat to the maintenance provision for streets constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by Article 27 (Temporary use of land by National Grid) to reinstate the land to the reasonable satisfaction of the owners of the land. The Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. The **7.3 Outline Construction Traffic Management PlanREP4-174]** further notes that the Main Works Contractor will liaise with the relevant highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management.	Article 18 Construction alteration and maintenance of streets and other structures The wording of Article 18 does not set out how infrastructure will be maintained by the Applicant where the authority does not wish to adopt it. This will occur in particular with the proposed footway/cycleway provision on Bentley Road which is to remain temporarily in place until the works have been completed, because the infrastructure is only needed whilst the works are taking place due to the high level of HGV activity and the impact on cyclists. ECC require the infrastructure to be maintained by the Applicant until such time as it is removed and the land returned to its previous state so wording in the dDCO should be made clear. The completion of works and maintenance timescale is more complex due to the need for multiple DCOs to use the proposed infrastructure. Further clarity is required on how these matters will be managed, and evidence in the form of a collaboration agreement between the various DCOs	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			benefiting from the proposed mitigation. The infrastructure should be maintained at the same excellent standard as required by the LHA and with continuity between each DCO. The above should be included in the DCO to ensure that the mitigation measures proposed will remain in good order for the duration of their availability to the public. Shared infrastructure and collaboration provisions are particularly relevant given the close interactions with North Falls, Five Estuaries and Lower Thames Crossing that the Applicant itself has acknowledged at **[REP 3-074]** DCO 1.A18. The dDCO should provide a framework for those interactions, not leave them to ad hoc resolution.	
13	DCO Wording – Discharge of Water	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of	Part 4 Supplemental Powers Article 20 Discharge of water 5.5.1 The timings set out within Article 20(9) must be increased to 42 days to give sufficient time for the Lead Local Flood Authority to consider any application for consent under this part of the DCO without having to arrange for an extension to the decision making period. This request reflects the available internal resourcing and the increase in time would also bring the DCO in line with other DCOs, such as Bramford to Twinstead. See further the general point made on time periods in row 8 above.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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.		
14	DCO Wording – Defence to proceedings in respect of statutory nuisance	An Outline Noise and Vibration Management Plan is provided at **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management PlanREP4-170]**. This outline management plan will be progressed as all other outline management plans will be and will be controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order.	5.6 Part 6 Miscellaneous and General Article 48 Defence to proceedings in respect of statutory nuisance (s82 EPA 1990) 5.6.1 Given the extent of this article, ECC suggests that a Noise and Vibration Management Plan should be prepared, as envisaged in the Applicant's Environmental Statement (APP-306). See further above at row 4.	Under Discussion
15	DCO Wording – Traffic Regulation	Given the scale of the Project, the programme pressures and constraint costs that become payable for each day that the Project's energisation is delayed (all of which are explained in more detail elsewhere in this SOCG), the Applicant cannot accept a 12 week period in Article 49 (traffic regulation).	Article 49 – Traffic Regulation 5.6.2 ECC require the timescales at 49(10) for dealing with the permanent TROs to be 12 weeks to align with the Temporary Traffic Regulation Order process. This is to take account of resource and the cumulative impacts that are discussed at length in this LIR.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
			5.6.3 At Article 49(10) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and the requirement to consult with external consultees including the Police. It is requested this period be extended to 42 days. See further the general point made on time periods in row 8 above.	
16	DCO Wording – disapplication of legislation	ECC comments on the disapplication of The Hedgerow Regulations are noted. The Applicant awaits ECC's comments at Deadline 4.	The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC does not agree with the current proposed drafting given the breadth of the disapplication, which would allow removal of otherwise strongly protected hedgerows via a "reasonably believes it to be necessary" trigger, without the consent of the LPA. The corridor within which construction will take place is very wide. The Applicant's Hedgerow Report (APP-161) identified 466 hedgerows as potentially important, and surveyed 79, of which 34 were identified as "important". Hedgerows in this landscape are biodiversity assets of national policy weight, not generic vegetation. Full commentary on this topic was provided in ECC's Deadline 4 response **[REP4-328]**.	Under Discussion

ID	Matter	National Grid's Position	Essex County Council's Position	Status
17	DCO Wording – Felling or Lopping	In practice, the term 'near' is intended to relate to, for example, roots that cross beneath the Order limits or canopies that cross over the Order limits and to which the inclusion in the draft Development Consent Order of an arbitrary distance would be impractical and potentially cause significant delays to the construction of the authorised development. A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. The article does not authorise the Applicant to do anything that is not necessary. The Applicant has already commented on the 28 day decision period elsewhere in this SOCG and so does not repeat its justification here. Given affected vegetation and how it is affected is clearly shown on **2.16 Trees and Hedgerows to be Removed and/or Managed PlansREP4-029 to REP4-036]** (i.e. "affected managed" or "potentially affected", it is unclear why a definition of "affected vegetation" is required.	Article 50 – Felling or Lopping 5.6.4 ECC recognised that this Article allows for wide powers to do the tree work which the undertaker reasonably believes to be necessary and this consequently gives the Applicant powers to lop prune, cut, trim, coppice, pollard, reduce in height or width any tree shrub, shrubbery, hedgerow or important hedge under or within the overhanging or near part of the authorised development if it reasonably believes it necessary to do so to prevent obstruction/interference with construction, operation or maintenance of authorised development or any apparatus or from constituting a danger to persons constructing maintaining or operating the authorised development. 5.6.5 While a caveat about not causing unnecessary damage to trees / vegetation is included as is the requirement for consent where works involving trees / vegetation overhanging the highway, ECC maintains a concern that the use of the term 'near' is too ambiguous. This will lead to uncertainty and the potential for more works to be undertaken than absolutely necessary. As such, ECC consider that 'near' should either be removed, or defined as a specific value e.g. 2m, with works only occurring with some prior notice to the relevant LPA. 5.6.6 An open-ended option for vegetation to be removed without the impact of this being	Under Discussion

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			appraised is not supported as the impacts on protected hedgerows requires proper assessment. 5.6.7 It is also noted that the areas marked 'affected vegetation' would need careful review once available and it assumed that any additional works would be within the parameters of the approved OLEMP. 5.6.8 At Article 50(5) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and it is requested this period be extended to 42 days to allow for the appropriate consultation to take place with and to avoid the need to request extensions of time which has been the experience of the Authority when dealing with the discharge of Requirements under this Article on other NSIP schemes. 5.6.9 It is also considered the term 'affected vegetation' should be defined. 5.6.10 There is concern that as drafted, this section gives extensive powers and unless further defined in the Trees / Hedgerows to be Removed / Management Plans (i.e. to define limits to the extent of pruning of TPO beyond which prior approval would be required), the powers could result in harm to TPO trees with significant visual amenity. This will need to be reviewed once the Trees / Hedgerows to be Removed / Management Plans are submitted.	

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18	DCO Wording – Felling or Lopping / Trees subject to Tree Preservation Orders	The Applicant refers to it response to ECC's comments on Article 50 above. The Applicant does not consider it necessary to include a notice provision and notes that such provisions are not included in other recent development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Article 50 Felling or Lopping / 51 Trees subject to Tree Preservation Order Reinstatement and Compensation 5.6.11 Article 51 permits an undertaker to carry out extensive tree works to TP trees if it reasonably believes it is necessary to do so in connection with the implementation of the DCO and gives deemed consent to do so. Owing to the special importance of trees subject to TPOs, a definition of "near" is required for the avoidance of doubt (ideally defined as a specific value e.g. 2m for example, or as otherwise agreed). 5.6.12 Additional wording should also be included in this Article to the effect that advance notice of proposed works must be given to the Local Planning Authority and opportunity given for the planning authority to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work).	Under Discussion
19	DCO Wording - Safeguarding	The Applicant does not follow why more than two business days is required in this instance. The Council's proposed drafting prevents them from determining the application for a further three business days than is proposed by the Applicant. The Applicant acknowledges ECC's position on Article 56(5). The term "business days" is used elsewhere in the draft Development Consent Order.	Article 56 Safeguarding 5.6.13 Article 56(3)(b) should be amended as follows: "they may not determine the application before the end of the period of 21 days, beginning five business days after the relevant planning authority has sent the notice to the undertaker by first class post or by such other means of service as may be agreed with the relevant planning authority, which will be deemed to be the date on which the undertaker receives the notice or copy of	Under Discussion

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			the application." This is to ensure that adequate time is offered for all parties engaged in the process. 5.6.14 ECC notes and accepts the following amend made to Article 56(5) "In determining an application for planning permission a relevant planning authority must take into account any representations received in accordance with this article". ECC notes the Applicant's response in **[REP 3-074]** at DCO 1.A40. The Applicant has addressed only the period that follows the trigger, not the trigger point itself. Two business days from notice is too short – five business days is a modest extension and does not affect the overall envelope materially.	
20	DCO Wording – Service of Notices	The Applicant notes ECC's position.	Article 61 Service of Notices 5.6.16 It is acknowledged direct email contacts/ methods of service between the Essex Authorities and Undertaker to promote efficient communication is required with a preference for email communication.	Agreed
21	DCO Wording – protective provisions	ECC comments on the protective provisions are noted, and National Grid will continue to engage with ECC on this matter.	As highway authority, ECC welcomes draft Protective Provisions but these need to be the subject of further discussion between ECC and the Applicant to ensure appropriate mitigations. As ECC only had sight of NGET's position (February 2026) on 20 February 2026, with limited time to respond, ECC reserves the	Under Discussion

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			opportunity to provide a comprehensive response to NGET's statement at Deadline 4 of the Examination	
22	DCO Wording – Protective Provisions (Drainage and Flood)	The Applicant is liaising with ECC as lead local flood authority and awaits comments on the latest draft protective provisions shared on 3 March 2026.	Schedule 16 Protective Provisions Part 3 for the protection of drainage and flood authorities Approval of Plans Paragraph 3(1)(a) – The Lead Local Flood Authority recommends the inclusion of approval under Section 23 of the Land Drainage Act 199. Furthermore, with reference to Paragraph 3(6), where the drainage strategy plan changes the LLFA should be consulted regarding the changes at the earliest opportunity to ensure there is adequate time to consider any request. A minimum of 20 business days is suggested. (Para 5.9.1-5.9.2)	Under Discussion
23	DCO Wording – Protective Provisions (Highways)	It is the Applicant's understanding that as noted the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the highways authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments which are summarised in ECC's Local Impact Report) to all the Highways Authorities and we await comments.	Part 4 for the protection of the highway authorities As mentioned previously, ECC's preference is to enter into a Framework Highways Agreement or similar side agreement with the Applicant to deal with the design approvals rather than the use of Protected Provisions. This is on the basis that ECC expect (as indeed the public would expect) a level of oversight and control of the local highway network. However, we have provided comments on the text in the dDCO should the	Under Discussion

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		In the absence of a Framework Agreement, the Applicant is considering the comments raised by the Council.	Protected Provisions be the only route available. The "Approval period" is defined as 14 days for Minor Works and 28 days for Major Works. ECC refer to the discussion points around this at Schedule 11 where ECC have requested that the formal decision period is extended to 35 days to be in line with the Bramford to Twinstead DCO. A description of the types of work that constitutes "early works" is needed as is shown for the pre-commencement definition. The agreed wording from the recently consented Five Estuaries DCO (Protected Provisions, Article 131) should be included for the definition of "road safety audits": "(1) The undertaker must procure that an appropriately qualified RSA team (as defined in HPN039 or DMRB Volume 5 Section 2 Part 2 (GG 119) as advised by the local highway authority (acting reasonably) or any replacement or modification of that standard) undertakes road safety audit in accordance with the standard as set out in HPN039 or DMRB standard GG 119 as advised by the local highway authority (acting reasonably) for works which involve creation, alteration, expansion or other modifications of the local highway but not for works which consist only of trenchless installation beneath highways, and must provide copies of the reports of such audits to the local highway authority	

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			within 10 business days of their receipt by the undertaker. The local highway authority must be invited to participate in the road safety audit conducted under sub-paragraph (1) No works on a local highway must be commenced out until a satisfactory Stage 1 and Stage 2 Road Safety Audit has been carried out and all reasonable recommendation raised by them or any exceptions are approved by the local highway authority (acting reasonably) Where the report of the stage 3 and 4 road safety audit identifies any recommended measures in respect of the local highway, the undertaken must carry out, at its own expense and to the reasonable satisfaction of the local highway authority, those measures identified as part of stage 3 and 4 audit which the undertaker considers necessary (acting reasonably) and for the avoidance of doubt any matters related to the health and safety will be considered as reasonable, and which do not give rise to any new or materially different environmental effects in comparison with those identified in the environmental statement." The definition of "security" includes either (a) a letter of credit; or (b) such other information that evidences the credit standing of the undertaker. This is a non-standard way for ECC to deal with the form of security which is usually required as a bond. ECC notes the	

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			Applicant's solicitors were reviewing the form of security through ongoing internal discussions and the drafting was to be updated accordingly where necessary. It does not appear that there have been changes made and the Explanatory Memorandum (Document 3.2) offers no further detail on this point. At paragraph 6 (2) ECC requests that a timescale is included to provide notice to the local authority on pre-commencement works. Currently the statement is vague. Paragraph 8 requires wording to be added around suitably qualified persons to be involved in the initial and formal engagement with the local highway authority. ECC have had previous experience on other DCOs where there was a lack of knowledge of the design which meant that ECC were having to spend more time dealing with issues. Therefore, we believe this requirement should be tightened up. Paragraph 11 (1b) sets out that the formal approval can only commence when the initial checking fee has been paid. It would appear reasonable to include this requirement in paragraph 10 such that the fee is paid in advance of the time involved for the initial engagement. (Para 5.9.3-5.9.10)	

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24	DCO Wording – Certified Documents	The documents to be certified will be available on the Planning Inspectorate's website.	5.10 Schedule 19 Certified Documents 5.10.1 The dDCO should secure that certified documents remain readily available to local authorities engaged in the discharge of requirement, in the interests of clarity, efficiency of process and transparency.	Under Discussion

5. Confirmation of Agreement

Body Text.

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Essex County Council:

……

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
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
ECC	Essex County Council
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
MIIA	Mineral Infrastructure Impact Assessment
MRA	Minerals Resource Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PARs	Primary Access Routes
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WIIA	Waste Infrastructure Impact Assessment
WSI	Written Scheme of Investigation
ZoI	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