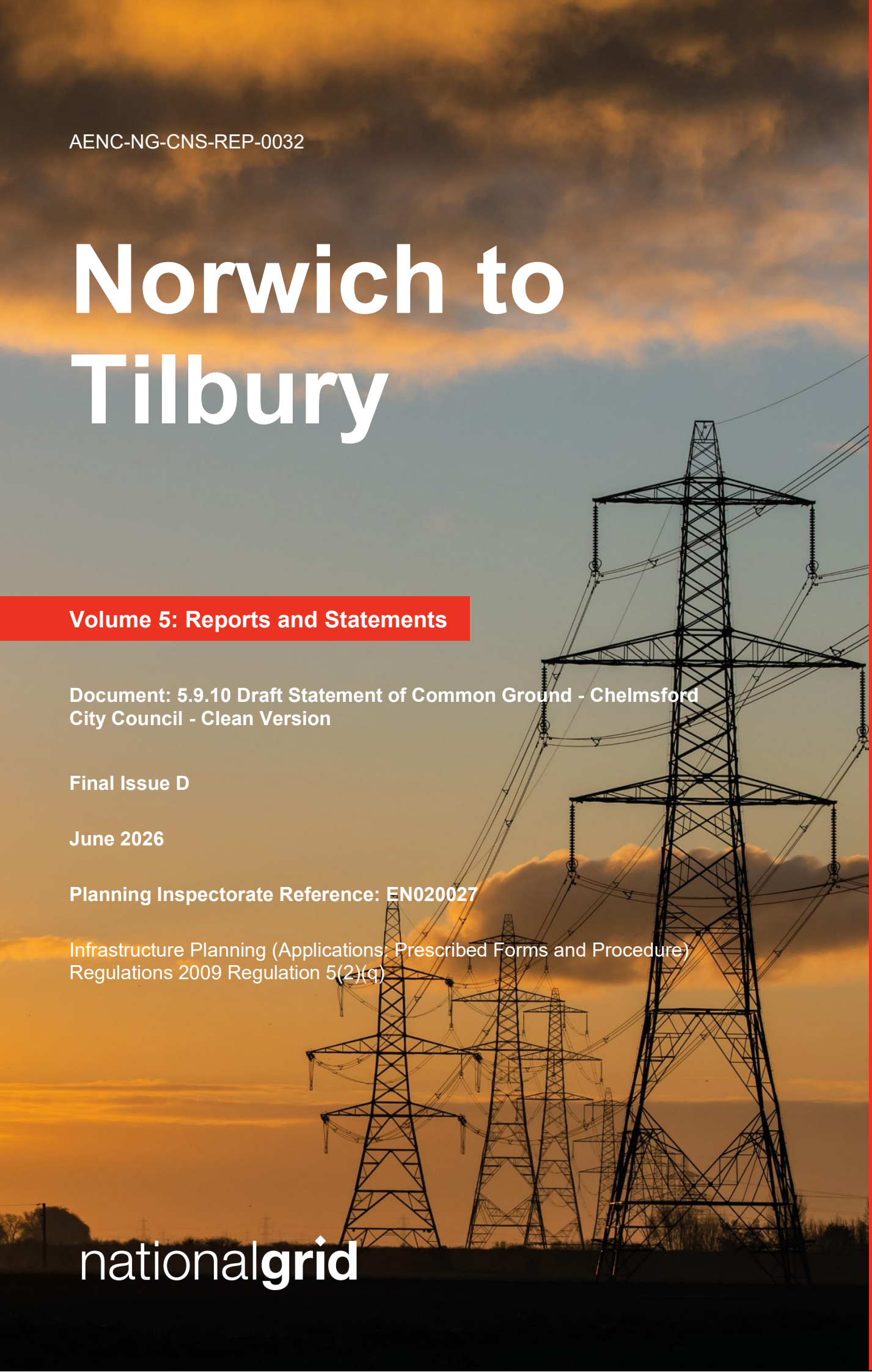
AENC-NG-CNS-REP-0032

Norwich to Tilbury



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nationalgrid

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1. Introduction

1.1 Overview

1.1.1 This draft Statement of Common Ground (SoCG) has been prepared relating to the application for development consent for the proposed Norwich to Tilbury project (the 'Project') made by National Grid Electricity Transmission plc (referred to as 'the Applicant' within this document). It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).

1.1.2 This SoCG has been prepared by National Grid as the Applicant and Chelmsford City Council (CCC). Chelmsford City Council is a prescribed consultee under Section 43 of the Planning Act 2008 (PA 2008) as a Host Authority.

1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents. All documents are available in the deposit locations and /or the Planning Inspectorate website.

1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties. It identifies areas of the Project within the Development Consent Order (DCO) application ('the Application'), where matters are agreed, under discussion or not agreed between the parties.

1.1.5 The engagement between the parties across the breadth of matters is ongoing. The SoCG is an evolving document and detailed wording within it is still being discussed between the parties.

1.1.6 This draft SoCG has been prepared for deadline 5. It is intended to be a live and working document which will be updated as the Project progresses and shared with Chelmsford City Council at key points for discussion.

1.1.7 Future iterations will evolve from this point and all parties reserve the right to supplement the matters identified as we progress the discussions to ensure it is comprehensive. There are many items within it that although not currently agreed have the potential to be resolved. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.

1.1.8 The parties will continue to work together, seeking resolution where appropriate to ensure this SoCG is a reliable and up to date document which can inform the examination.

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

- Project development, description and design
- Ecology and Biodiversity

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

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

1.2 Summary of matters under discussion

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

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
Ecology and Biodiversity			
3.3.6 – Key parameters and assumptions	CCC is still reviewing key parameters and assumptions. The Applicant maintains that the key parameters and assumptions are appropriate and relevant for the Project.	Awaiting ECC Place Services comments	Matter unlikely to be agreed.
3.3.11 – Construction effects	CCC has concerns regarding level of bat survey and construction effects upon bats. The Applicant is working with Natural England to produce a draft project wide bat licence. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7
3.3.15 – Outline CoCP	CCC remains unconvinced that the Outline CoCP provides adequate guarantees of ECoW competence or capacity.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
	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).		
3.3.16 – Outline LEMP	CCC is concerned on the percentage completion of bat surveys, and the mitigation proposed for bat roosts lost. The Applicant confirms that the methodology for surveying bat roosts has been agreed with Natural England, and that full aerial/emergence bat surveys will be undertaken on trees due to be lost during the detailed design phase of the Project, post-consent.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7
3.3.20 – Tree replacement/ compensation	CCC is working with NGET and other host authorities to explore provision of offsite planting. The Applicant will continue to engage with CCC on the provision of offsite planting and the 3:1 replacement planting for individual trees and individual trees within small groups.	Discussions on going.	Resolution likely by Deadline 7
3.3.21 – Data sources (bats) 3.3.22 – Survey methodology (bats) 3.3.23 – Baseline conditions and receptors (bats) 3.3.24 – Standard mitigation (bats)	CCC to review the survey information from the 2025 season submitted to the Planning Inspectorate in November 2025. The Applicant confirms that the methodology for surveying bat roosts has been agreed with Natural England, and that full aerial/emergence bat surveys will be undertaken on trees due to be lost during the detailed design phase of the Project, post-consent.	Awaiting ECC Place Services comments	Matters unlikely to be agreed.
Historic Environment			
3.7.25 – Outline CoCP (built heritage)	CCC has requested amendments to commitments H04 and H06 of the Outline CoCP. The Applicant has	The matter remains under discussion whilst	Resolution likely by Deadline 7.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
	confirmed commitment H04 has been updated in line with CCC's recommendation. In relation to H06, the Applicant notes that the Outline LEMP includes measures to retain and reinstate historic landscape features including protected lanes and Outline CoCP has been updated in line with CCC's recommendation.	final comments are being obtained regarding protected lanes.	
3.7.29 - Outline Archaeological Mitigation Strategy and Outline WSI	CCC requests the Outline AMS-WSI is amended to clarify the extent of further evaluation required The Applicant confirms that an updated Outline AMS-WSI is being prepared and will be submitted at Deadline 5.	CCC defers to ECC Archaeology. Comments awaited.	Resolution likely by Deadline 7.
Landscape and Visual			
3.8.1 – Policy and legislation	CCC requests further consideration of compensation. CCC to review **8.8.2 Applicant's**. CCC note that new consideration should be taken to the updated EN-1 policy requirements, otherwise no further comments have been raised in the CCC LIR. The applicant is satisfied these measures have been picked up as part of the application and propose this matter is moved to Agreed.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7
3.8.3 – Study area (viewpoints)	CCC note in their LIR that certain visual assessment needs to extend beyond the 3Km study area. The Applicant has noted that this matter is likely to remain not Agreed as the Study Area is unlikely to move with regards to viewpoints.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.
3.8.4 – Data sources 3.8.5 – Assessment methodology (including LVIA methodology) 3.8.7 – Baseline conditions and receptors	CCC has concerns about the approach to landscape value assessment and gaps in the viewpoint assessments. The Applicant notes as there is no change in position with regards to Data Sources, Assessment methodology and Baseline Condition and Receptors that these matters are likely to remain not agreed,	Awaiting ECC Place Services comments	Resolution likely by Deadline 7

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
3.8.6 – Key parameters and assumptions	CCC is concerned that the landscape value criteria are flawed. CCC to review the Key parameters and assumptions associated with the Landscape and Visual Impact Assessment.	Awaiting ECC Place Services comments	Resolution by Deadline 7
3.8.8 – Embedded mitigation	CCC maintains concerns around the adequacy of undergrounding, mitigation and lack of compensation. The Applicant reiterates that the embedded mitigation proposed is considered appropriate.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.
3.8.9 – Standard mitigation	CCC is concerned that the standard mitigation measures proposed do not wholly mitigate substantial significant temporary impacts caused by construction. The Applicant states that these measures seek to limit effects through adherence to good site practices and achieving legal compliance, and are considered appropriate.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.
3.8.10 – Additional mitigation	CCC consider the additional mitigation measures do not address significant residual negative impacts from pylons and the overhead cables. CCC to review **8.8.2 Applicant's Comments on Local Impact Reports.** The Applicant reiterates mitigation hierarchy is being utilised and that the additional mitigation proposed is considered appropriate.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.
3.8.11 – Construction effects	CCC is concerned about long distance visual affects at the end of the construction phase. The Applicant has responded to concerns raised regarding the extent of construction effects in **Appendix H of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**	Awaiting ECC Place Services comments	Resolution likely to Deadline 7
3.8.12 – Operational (and maintenance) effects	CCC's position is that at the operational (and maintenance) stage impacts are likely to still be major significant rather than moderate significant beyond 0.5 km. The Applicant maintains the position that the assessment of effects during operation (and maintenance) presented is considered appropriate.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
3.8.13 – Residual effects	CCC has comments on residual effects on certain LCAs and visual receptor areas. The Applicant provides further detail on LCAs mentioned by CCC and retains that the summary of residual effects arising as a result of the Project is considered appropriate. Acknowledges that viewpoint details at Chelmer Valley have been amended in the errata.	Awaiting ECC Place Services comments	Matter unlikely to be agreed during examination.
3.8.14 – Great Waltham and Little Waltham	CCC is concerned about the historical landscape setting associated with Langleys. The residual landscape and visual effects in the vicinity of Great and Little Waltham are presented in ES Chapter 13 - Landscape and Visual. The Applicant maintains that the summary of residual effects arising as a result of the Project is considered appropriate.	Awaiting ECC Place Services comments CCC disagrees. Unlikely to reach agreement.	Resolution likely by Deadline 7
3.8.15 – Outline CoCP	CCC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7.
3.8.16 – Outline LEMP	ECC is reviewing the oLEMP in relation to landscape and visual and will provide the Applicant with an update once complete.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7.
3.8.17 – Cumulative impacts	CCC is concerned about the cumulative effect of multiple pylons. 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 and along the rest of the Project.	Awaiting ECC Place Services comments	Resolution likely by Deadline 7.
Socio-economics, Recreation and Tourism			
3.9.7 – Embedded mitigation 3.9.8 – Standard mitigation	CCC requests community liaison to address local concerns, with appropriate compensation. The Applicant notes that mitigation is set out in the Outline CoCP and details of community engagement in the Outline CoCP Appendix E – Community Engagement and Public Information. The Applicant proposes that through ongoing engagement between the parties, this matter can be moved to agreed	CCC remains concerned about hours of working. CCC suggest appointment of Community Liaison Officer in common with other NSIPS.	Resolution likely by Deadline 7

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
3.9.9 – Additional mitigation 3.9.12 – Residual effects 3.9.16 – Skills and Employment Plan and Skills Fund	CCC requests the preparation of a Local Skills and Employment Plan and is concerned about the proposed construction working hours. The Applicant has submitted an Employment and Skills Plan into the Examination at Deadline 5. The Applicant proposes that through ongoing engagement between the parties, this matter can be moved to agreed	Awaiting Employment and Skills Plan. Discussions on going.	Resolution likely by Deadline 6
3.9.14 – Outline CoCP	ECC is reviewing the oCoCP in relation to Socio Economics, Recreation and Tourism and will provide the Applicant with an update once complete.	ECC comments awaited.	Resolution likely by Deadline 7.
3.9.15 – Public Rights of Way	CCC seek further information on PRoWs and states the importance of these features in providing access for recreational opportunities, and notes the importance of bank holiday and Sunday working hours on the use of PROW. The Applicant refers CCC to the Outline PRoW Management Plan.	ECC comments awaited.	Resolution likely by Deadline 7.
Cumulative Effects			
3.11.4 – Assessment methodology 3.11.5 – Key parameters and assumptions 3.11.6 – Baseline conditions and receptors 3.11.7 – Embedded mitigation 3.11.10 – Construction effects - Intra-project cumulative effects	CCC note that there are a number of interproject effects for Landscape and Visual, Archaeology, Noise and Vibration and Health and Wellbeing. The Applicant confirms that consideration of intra-project effects in regard to agriculture and soil, ecology and biodiversity, historic environment, traffic and transport, noise, Health and Wellbeing and landscape and visual, has been undertaken.	Awaiting comments from ECC. Will review SoCG by deadline 7.	Resolution likely by Deadline 7.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
3.11.8 – Standard mitigation 3.11.9 – Additional mitigation	CCC note that comments on standard and additional mitigation for all other topics are relevant as part of the cumulative effects. The Applicant notes that the approach to Standard and Additional Mitigation are considered appropriate and adequate.	Awaiting comments from ECC. Will review SoCG by deadline 7.	Resolution likely by Deadline 7.
3.11.10 (a to c) – Construction effects 3.11.11 (a to c and e) – Operational (and maintenance) effects 3.11.12 (a to e) – Residual effects	CCC set out concerns relating to ecology, landscape and visual, archaeology, health and wellbeing, and other impacts, such as businesses. The Applicant confirms that the cumulative effects assessment has been undertaken in accordance with the Scoping Report. Scoping Opinion is presented in ES Chapter 17 - Cumulative Effects. These assessments are considered adequate and appropriate.	Awaiting comments from ECC. Will review SoCG by deadline 7.	Resolution likely by Deadline 7.
3.11.13 – Specific Chelmsford related issues	CCC state that the impacts of the Project on all other existing NSIPS and strategic sites need to be considered. The Applicant confirms that an updated cumulative effects assessment, will be submitted during examination.	Awaiting comments from ECC. Will review SoCG by deadline 7.	Resolution likely by Deadline 7.
3.11.14 – Outline CoCP	CCC is reviewing the updated **7.2 Outline Code of Construction Practice [REP4-164]** and will provide the Applicant with an update once complete.	Awaiting comments from ECC. Will review SoCG by deadline 7.	Resolution likely by Deadline 7.
Development Consent Order			
3.12.1 – DCO requirements – Additional requirements	CCC considers that the DCO drafting should explicitly refer to horizontal limits of deviation and seeks a requirement to publicise any decision to implement the alternative scheme. The Applicant considers that the limits of deviation and parameters set out in the Draft DCO and Works Plans provide sufficient flexibility, and that no further approval or notification is required. The Applicant will continue to liaise with CCC on this matter.	CCC disagrees with this stance and the matter is unlikely to be agreed. Currently discussions remain open in attempt to seek further resolution / refinement.	Matter unlikely to be agreed during examination.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
3.12.2 – Additional requirements - Height and location of lower height pylons	CCC considers that an additional requirement or mechanism is needed to secure consultation and notification of changes to pylon height and location within the Limits of Deviation. The Applicant considers that the Limits of Deviation are clearly described, and that no further approval or notification is required.	CCC disagrees with this stance and the matter is unlikely to be agreed. Currently discussions remain open in attempt to seek further resolution / refinement.	Resolution likely by Deadline 7.
3.12.4 – DCO requirements- Archaeological post-excavation assessments	CCC considers that Requirement 5 should explicitly provide for a separate evaluation stage, include post-consent archaeological trenching, and secure timescales for post-excavation assessments. The Applicant considers that these matters are already secured through Requirement 5 and the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation.	ECC archaeology comments awaited.	Resolution likely by Deadline 6.
3.12.5 – DCO requirements - Archaeology requirement wording	CCC considers that Requirement 5 should be amended to include more explicit provisions for written schemes of investigation, post-excavation assessment, publication, and archive deposition. The Applicant considers that these matters are already secured through Requirement 5 and the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation.	ECC archaeology comments awaited.	Resolution likely by Deadline 6.
3.12.9 – DCO requirements - Fees	CCC considers the proposed fee insufficient and seeks alignment with national planning fees. The Applicant has amended the Draft DCO to align fees with the national schedule for discharge of conditions.	Provision should be made to account for yearly fee rises in accordance with standard discharging procedures.	Resolution likely by Deadline 5.
3.12.10 – DCO requirements - Post-consent programme of ecological mitigation	CCC considers that a post-consent ecological mitigation programme and BNG delivery plan should be secured through a DCO Requirement. The Applicant considers that these matters are secured through the Outline Landscape and Ecological Management Plan and Outline Code of Construction Practice.	Currently discussions remain open in attempt to seek further resolution / refinement. ECC Place Services comments awaited.	Resolution likely by Deadline 7.

SoCG ID	NGET Summary of matter under discussion	CCC Commentary	Deadline for resolution
Appendix A-DCO Wording	Discussions are ongoing in relation to detailed drafting points on: • Control documents; • Limits of deviation; • Trees subject to Tree Preservation Orders; • Draft protective provisions.	Noted.	Resolution likely by Deadline 7.

1.3 Project Description

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

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
  - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1)
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

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

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

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

1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

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

2. Record of Key Engagement

2.1 Introduction

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

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

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

2.2 Summary of Key Engagement

2.2.1 Appendix B provides an overview of the key engagement that has taken place between the Applicant and CCC.

2.2.2 It is agreed that Appendix B is an accurate record of the key meetings and consultation undertaken between the Applicant and Chelmsford City Council in relation to the issues addressed in this SoCG.

3. Matters Agreed, Not Agreed or Under discussion

3.1 Overview

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

3.1.2 The red, amber, green status shows the level of agreement with CCC. 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 wherever possible to resolve, or refine, the extent of disagreement between the parties.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.
Area of Concern	There are a range of concerns or comments which are highlighted to the ExA for note / consideration.

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 3.12 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	Chelmsford City 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 does not 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 Reports [REP2-030]** The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore this matter Not Agreed.	CCC Objects to the Project. Our objection is based on the following grounds: The preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security. CCC consider that the presence of overhead lines and 40 – 50 m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area. CCC accept that the network reinforcement offered by the project is needed to accommodate the additional planned electricity generation in the East Anglia region. It would also assist in the decarbonisation of the UK's energy supply and help deliver the Government targets of net-zero by 2050. CCC recognise the	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			rapidly growing need for electricity as the climate emergency requires us to help support the replacement of fossil fuels such as oil and gas as soon as possible and accept that the network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted/planned electricity generation in East Anglia. However, this does not mean that all proposals which may assist in reducing climate change should be approved at any cost. In general, CCC does not agree that the Applicant has adequately demonstrated the need case for the Norwich to Tilbury project at this time. The Applicant has confirmed that no further evidence will be provided to justify the timing or scale of reinforcement required, despite significant uncertainty around the contracted generation assumed in the need case and the likelihood that many of these projects will connect by 2030. We note that the Applicant has not addressed the findings of the Hiorns Report, which concludes that contracted generation volumes are unlikely to materialise as assumed and that reinforcement could potentially be deferred without constraining offshore wind delivery. In the absence of updated sensitivity testing, transparency on the status of contracted connections, or further	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			justification on timing, we cannot yet support the asserted urgency or necessity of this specific reinforcement proposal. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1153) and comments to the first Written QuestionsREP3 – 075. Unable to reach a mutually agreed position	
3.2.2	Project timing	Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. The Applicant is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** 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.	CCC recognise the timing for the project is driven by the need for capacity in the transmission system by 2030 and acknowledge NGETs contractual and license obligations. Yet it is CCC's view that such benefit should not and cannot be secured at the expense of Chelmsford's local communities, landscapes and environments that would be affected by the proposal. CCC previously raised concerns in responses to consultation regarding the uncertainties surrounding the timeframes for planned future connections stated by the National Grid Electricity Transmission (NGET). The Hiorns Report (2023, jointly commissioned by Essex County Council, Suffolk County Council and Norfolk County Council) concluded that the case for the Norwich to Tilbury proposal focused solely on the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			The report identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore High Voltage Direct Current (HVDC) link, and it could not be concluded that the NGET proposal was the best option. If the timing for the network reinforcement is less acute as suggested in the Hiorns report, CCC considers that alternative schemes to the proposed lattice pylons scheme, such as off-shore and High Voltage Direct Current (HVDC) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme. CCC does not agree that the Applicant has demonstrated a sufficiently robust or transparent basis for the asserted 2030 delivery deadline. While we recognise National Grid's licence obligations, we are concerned that the contracted connection dates underpinning the timing case have not been tested against the real-world readiness of those generation projects. Evidence referenced in the Examination, particularly the findings of the Hiorns Report, indicates significant uncertainty in	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			whether generators will connect at the volume and pace assumed. This could materially affect both the urgency of reinforcement and the viability of alternative solutions. We maintain that a further review of the contracted generation position and connection readiness is required in order to properly substantiate the timescale for Norwich to Tilbury. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1 - 153) and comments to the first Written Questions REP3 – 075 Unable to reach a mutually agreed position	
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury. 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 Reports [REP2-030].** The Applicant	CCC objects to the proposal. CCC consider that the preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security. CCC consider that the presence of overhead lines and 40 - 50m high pylons would be visually harmful and would result	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.	in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area. CCC considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure across Chelmsford and Essex should be explored fully. CCC recognises that these options would need to be delivered in a timely manner, and without risk to national net zero, renewable energy generation and decarbonisation targets and energy security. CCC does not agree that the submitted overhead line route represents the only, or the least-harm, strategic option. We consider that credible alternative should be fully explored, particularly if updated analysis shows that the contracted generation and delivery timescales are less acute than currently asserted. Evidence presented in the Examination, including the Hiorns Report, indicates significant uncertainty in the readiness and timing of contracted generation projects. If reinforcement is not required as urgently as the Applicant claims, this could materially improve the feasibility of alternatives that would substantially reduce the scale of	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			onshore infrastructure across Chelmsford and wider Essex. We maintain that a transparent reassessment of route strategy is required before the onshore overhead line can be justified. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 Unable to reach a mutually agreed position	
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 energy bills.	CCC Objects to the proposal. The preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security. CCC consider that the presence of overhead lines and 40 - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area. CCC considers that credible alternatives such as an offshore centred approach or	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**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.	High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure across Chelmsford and Essex should be explored fully. CCC refers to its comments regarding the design of the development to both its Statutory Consultation response and its Targeted Consultation response. CCC consider that 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. This approach would not be contrary to national policy statements and would be consistent with Holford Rule 7 where it states projects should be routed to minimise as far as possible effects on development. CCC has raised significant and material concerns relating to the proposal in relation to Great and Little Waltham. CCC maintains these concerns and has been unable to resolve them prior to the submission of the application for a Development Consent Order. CCC does not agree that a predominantly overhead line route has been justified or that the Applicant has demonstrated that an overhead HVAC solution represents the least-harm or most appropriate option for this project.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			The presumption of overhead lines set out in EN-5 is not absolute, and EN-5 requires applicants to evidence that all feasible alternatives, including undergrounding and offshore options, have been robustly assessed in environmental, technical and cost terms. CCC maintains that offshore-centred approaches and HVDC undergrounding remain credible strategic options, particularly given the significant and permanent landscape, visual, ecological, heritage and arboricultural impacts of the proposed overhead line within Chelmsford. Uncertainty around the project's timing and contracted generation (as highlighted in the Hiorns Report) may materially affect the feasibility and deliverability of non-overhead alternatives. CCC considers that the Applicant must undertake a more transparent and robust comparative assessment, including updated need-case sensitivity testing, before the overhead line route can be justified as the most appropriate option Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 Unable to reach a mutually agreed position	

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Project development process – Design				
3.2.5	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 the Applicant'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" within the bounds of functional and safety constraints.	CCC notes that the Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Advice in NPS EN1 Section 4.6 is for applicants to consider the criteria for good design at an early stage when applying projects. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds in place and takes account of often complex environments. CCC draws on the Planning Inspectorates 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. CCC consider there is an opportunity to be innovative in securing the approach to design whilst ensuring the infrastructure remains safe and secure. NG must follow a good design process to ensure that the infrastructure proposed remains functional whilst realising the best local outcomes. CCC consider that insufficient effort has been provided to mitigate the impact of the Project (particularly on heritage and landscape assets) and introduce good design within the proposal.	Not agreed

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		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 **7.15 Design and Access Statement [REP2-020]**. 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 Reports [REP2-030].**	CCC has significant concerns regarding the approach to Great and Little Waltham which are set out below at ID3.2 9 CCC considers that the Applicant has not demonstrated that the design process has adequately responded to local character, place-specific sensitivities, or the opportunities for innovative mitigation required by EN-1 and the Planning Inspectorate's Advice on Good Design. The proposed lattice pylon design and 50m overhead line solution would result in extensive, permanent and unavoidable landscape, visual and heritage harm, which indicates that the design process has not achieved a locally responsive outcome. The Applicant has relied too heavily on the Holford and Horlock Rules without adequately addressing their limitations, particularly that they do not reflect modern landscape guidance, local distinctiveness, or updated national policy objectives. Good design for a project of this scale requires robust exploration of alternative technologies and forms, including, undergrounding, HVDC options, T pylons and design-led solutions to minimise harm. Given the magnitude of local impacts, CCC considers that a more ambitious and locally responsive design approach is both possible and necessary to meet the expectations of EN-1 and the Planning	

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			Inspectorate's design advice. CCC considers that design review should be undertaken for the Project especially within the Great and Little Waltham gap. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075. Unable to reach a mutually agreed position	
3.2.6	Green belt	The Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt. The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this	The proposal would conflict with the purposes of including land within the Green Belt and would lead to loss of openness. The proposal, as inappropriate development (as per para 5.11.36 of NPS EN-1), would by definition be harmful to the Green Belt. It would result in encroachment and moderate harm to the openness of the Green Belt in both visual and spatial terms. The proposed development would conflict with national and local planning policies. The very special circumstances put forward by NGET would need to be considered alongside any other identified harm arising from the scheme, acknowledging that the proposal is inappropriate development. CCC disagrees with the Applicants position that the lines are pylons are not inappropriate within the Green Belt. In its Planning Statement, the Applicant makes the case that the proposed	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1 also confirms that '…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests: Where development within a Green Belt requires very special circumstances to justify development'. For the Applicant's position on Green belt, please refer to Section 3.14 'Land use – Green Belt' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	overhead lines (both new and existing as modified and reconductored) would comprise an engineering operation which benefits from the exception in NPPF para 154, meaning that the works would not constitute inappropriate development in the sense of NPPF para 153. CCC considers that the overhead lines and pylons comprise structures that do not fall within the categories listed within para 153. Therefore, they are inappropriate development which is harmful by definition and Very Special Circumstances (VSC) will be needed to clearly outweigh the harm by definition and any other harm identified. In Chelmsford, there would be approximately 32 pylons sited within the Green Belt which is not insignificant. As stated within CCC's Local Impact Report (REP1-153), from a spatial element, the Project would introduce substantial development into the area in terms of ground cover and built form that would diminish the openness of the Green Belt spatially. The proposed new pylons would introduce very sizeable new structures into the landscape. Whilst the steel lattice design of the pylons would allow views through the structures, their presence collectively and in linear layout would nonetheless result in prominent new features in the landscape.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Visually, the landscapes that would be affected by the Project are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale and height of the pylons and overhead wires mean the effect is an industrialisation of the countryside. Even where existing landscape features or proposed planting may be capable of reducing the effect on Green Belt openness from a visual perspective, CCC considers there can be no doubt that by their very presence, the considerable number of new pylons would have a substantial spatial effect which would undermine openness. The Project would conflict with the purposes of including land within the Green Belt. In terms of encroachment, the Project would place a large number of pylons (32) and associated infrastructure within an extensive number of fields within the countryside. Although maintaining some separation between them, the pylons and associated infrastructure would fundamentally alter the appearance of the fields and landscape that they would be sited within it. These would alter from a sequence of open green spaces to spaces accommodating large, industrialised development that would result	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			in encroachment, in contradiction of a Green Belt purpose. There would be adverse effects on openness as a result of the temporary construction works associated with the Proposed Development. The Project would have an adverse effect on Green Belt openness and would conflict with the purpose of the Green Belt to safeguard the countryside from encroachment. As a consequence, the Proposed Development would be inappropriate development in the London Green Belt. Inappropriate development is, by definition, harmful to the Green Belt. In accordance with NPS EN-1 and the NPPF, inappropriate development should not be approved except in very special circumstances. This approach was taken with regard to the consideration of the Yorkshire Green pylon proposal EN020024 which confirmed that the presence of overhead lines and pylons comprised inappropriate development. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1) and comments to the first Written Questions REP3-075 Unable to reach a mutually agreed position	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.2.7	Rural Areas	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].** There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**	CCC consider that proposals within the rural area should protect the identified character, beauty and appearance of the countryside. The proposal would introduce lattice pylons ranging from 40 - 50 (approx.) metres in height, overhead lines and associated infrastructure in the countryside. The proposal would lead to a harmful change in the identified character and appearance of the landscape, which would lead to a change in the character and quality of the landscape. It would lead to harmful visual intrusion, through the siting of high large-scale industrialised features that cannot be fully mitigated against. The proposal would lead to the harmful loss of the character and beauty of the countryside. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 Unable to reach a mutually agreed position	Not agreed
3.2.8	Green Wedge	The Applicant notes the position of the Green Wedge designation and the multi-functional purpose of this policy and its role in providing important open green networks and preventing urban sprawl. The Adopted (and emerging) Chelmsford Local Plan illustrate the location of the Green Wedge. In	The Green Wedge is a unique designation in Chelmsford and has a multi-functional role providing opportunities for cycling and walking as well as being a wildlife corridor. It overlays both the Green Belt and the Rural Area meaning that policies relating to	Not agreed

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		the context of proximity to the Project, areas identified as Green Wedge are located to the east of Broomfield extending north of Little Waltham to Braintree Road / Main Road (B1008) and its junction with the Essex Regiment Way (A131). In addition, an area of land to the east of Writtle extending to the main urban area of Chelmsford also includes Green Wedge land. The Project does not physically encroach into either of these areas identified as Green Wedge. Construction vehicles will use Roxwell Road, the A414 and the B1008 as primarily access roads. No permanent access routes are required to pylons to facilitate future maintenance. As described in **6.4 Environmental Statement Chapter 4- Project Description [APP-130]** there would be no physical woks associated with these permanent access roads. They are proposed rights of access only to allow for any maintenance or refurbishment required.	both the Green Belt and the countryside apply. Within the Green Wedge, the installation of permanent access routes is a symptom of industrialisation and incursion of the development within sensitive designated areas of the countryside. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 Unable to reach a mutually agreed position	
3.2.9	Great and Little Waltham	In line with the strong starting presumption set out in NPS EN-5, the proposed design technology is neither within a nationally designated landscape, nor is it within the setting of a nationally designated landscape. In line with NPS EN-5 we have also considered whether widespread and significant adverse landscape and/or visual impacts in non-designated landscape locations such as this may also justify the use of undergrounding. The Applicant has worked to minimise potential impacts on the historic environment through	There is a heritage and landscape hotspot in Great Waltham and Little Waltham. In Great Waltham and Little Waltham, CCC consider that the proposal would harmfully impact upon the setting of the Grade I listed Langleys, Langleys Grade II Registered Park and Garden and would lead to significant adverse impacts on Great Waltham and Little Waltham Conservation Areas, together with other designated and non-designated heritage assets.	Not agreed

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		strategic routeing and siting measures, and consideration of the results of archaeological fieldwork and heritage assessments throughout the design process. **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, provides a detailed assessment of potential effects on both designated and non-designated heritage assets, including those of archaeological interest. The Applicant has taken into account the Secretary of State's decision making criteria set out in the relevant NPSs and do not consider that in this case the level of effects justify the level of cost. Other forms of lattice designs as a form of mitigation (such as standard low heights) are considered as well as the T-pylon. **Appendix C of 5.15 Design Development Report [APP-122**] sets out the construction, operation and maintenance requirements of T-pylons including a technical appraisal for Chelmsford. **8.11 Approach to Scenarios [REP4-310]** submitted at Deadline 3 confirmed the proposed technology/pylon design at Great and Little Waltham is for standard height towers located south of the River Chelmer. For the Applicant's position on Great and Little Waltham, please refer to Section 3.7 'Alternatives – Great and Little Waltham' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Requirement 8 of the draft DCO secures the submission of plans showing the trees and hedgerows to be retained and removed. The plans must be approved by the relevant planning authority	In landscape and visual impact terms, there are concerns regarding the wider impact of the pylons and overhead line on the historical landscape setting associated with Langleys. The introduction of pylons would likely degrade the setting by forming a backdrop of pylons behind the building within the wider landscape. The proposal would be introduced into a location where views are otherwise absent of overhead lines resulting in a major and significant adverse effects by the introduction of industrialised features. The siting of the pylons and overhead lines within the gap between the two Defined Settlements of Great Waltham and Little Waltham would lead to the introduction of high industrialised features that would be at odds with the rural character and appearance of the area CCC's preferred option is that alternative mitigation in the form of underground cabling should be used for this section. Alternatively, different alignment should be chosen with further consideration being given to relocating the route to the north of Great Waltham and Little Waltham. Finally, upon exhausting the above options, regard should be given to the introduction of T pylons along this part of the route. To address CCC's concerns, NGET have proposed siting lower height pylons	

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		prior to commencement of works on that stage. In addition, details of onsite reinstatement planting and planting associated with the 3:1 commitment for individual trees (outside the Environmental Areas) will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of the draft DCO, which is also subject to the approval of the relevant local planning authority. The local authority will therefore have oversight and ultimate approval of the tree removal and reinstatement plans through the draft DCO.	between Great Waltham and Little Waltham. The proposed lower height pylons (TB136 to TB142) would reduce the extent of visibility from Grade I listed Langley's house and its immediate gardens. The Limits of Deviation include flexibility for three of the low (c.40m) height pylons at TB140-TB142 to be increased to full height pylons. This flexibility offers the opportunity to reduce the three pylons to two full height pylons, moving pylon TB141 further away from the edge of Great Waltham Conservation Area and the non-designated heritage asset Windmill House. CCC has expressed comments on this elsewhere within the SoCG, considering that whilst there would be a positive impact upon residential amenity, the proposal would still lead to unacceptable harm. Additional plans and visualisations have not been provided to enable consideration of this matter in full and CCC maintains that is has insufficient information to make a final assessment of the acceptability of this change. Cumulatively the greater harm to the other heritage assets and on landscape mean that the proposed mitigation strategy is inadequate A bespoke tree removal and replanting strategy for the Waltham Gap is required	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			including any changes to pylons TB140 – 142, which should be accompanied by a comprehensive integrated mitigated package. CCC object to the proposal due to lack of sufficient mitigation and appropriate compensation in relation to the harm to the historic environment, the sensitive landscape, ecology and residents. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 It is unlikely that the two parties will reach a mutually agreed position. The wider complexities of responding to the Examination deadlines, questions and other matters, have limited the time available to respond to concerns. In spite of this, discussions remain ongoing regarding the Waltham gap.	
Project development process – Consultation				
3.2.10	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in section 2 of the **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]** and responses to feedback received during consultation are included in the Feedback Report.	CCC can confirm that the non-statutory Consultation was held within the prescribed dates. CCC refers to its full response given within its Adequacy of Consultation response dated 15th September 2025.	Agreed

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		The non-statutory consultation was undertaken in accordance with the published section 2 of the **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068].**		
3.2.11	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in section 2 of the **5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069]** and responses to feedback received during consultation are included in the **5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069]**. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	CCC can confirm that the non-statutory Consultation was held within the prescribed dates. CCC refers to its full response given within its Adequacy of Consultation response dated 15th September 2025.	Agreed
3.2.12	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the **5.1 Consultation Report - Appendix E:Statement of Community Consultation (SoCC). [APP-071]** Responses to feedback received during statutory consultation are contained within the **5.1 Consultation Report [APP-066].** The statutory consultation was undertaken in accordance with the published SoCC. Noting that the 2024 Statutory Consultation has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'.	CCC can confirm that the statutory Consultation was held within the prescribed dates. CCC refers to its full response given within its Adequacy of Consultation response dated 15th September 2025. The matter has been moved to not agreed as we stand by these matters and do not think they have been satisfactorily addressed.	Not agreed

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3.2.13	2025 targeted consultation	Targeted consultations for Essex took place from 25 February 2025 – 27 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy section 10 of the **5.1 Consultation Report [APP-066]** and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within the **5.1 Consultation Report [APP-066].** 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 that the 2025 Targeted Consultation has already taken place and that respective positions remain unchanged, it may be appropriate to record this matter as 'not agreed'.	CCC can confirm that the targeted Consultation was held within the prescribed dates. CCC refers to its full response given within its Adequacy of Consultation response dated 15th September 2025. While NG considered that some changes to the Project may not be the most significant and not material, CCC considers that to those residents who may reside closer to them, their significance may be greater and they should be given an opportunity to comment on them through the targeted consultation carried out. The concentration of non-material changes may have a bearing on their materiality and how they are experienced by residents. The matter has been moved to not agreed as we stand by these matters and do not think they have been satisfactorily addressed.	Not agreed
Other matters as required				

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	Chelmsford City Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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 the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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.	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	Chelmsford City Council's Position	Status
3.3.4	Assessment Methodology	The assessment methodology was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	The Applicant issued a technical note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species, including water voles have been agreed with Natural England. Detail on habitat suitability assessment and any survey limitations was provided within the water vole technical report, 6.8.A13 Environmental Statement **Appendix 8.13 - Otter and Water Vole Report – Redacted [AS-040]**.	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
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in **Section 8.4 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The key parameters and assumptions presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 **in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	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

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			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 **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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 [AS-026** to **AS-045].**	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	Chelmsford City 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 Biodiversity [AS-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 Biodiversity [AS-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. The Applicant issued the 'Summary of Proposed Protected Species Mitigation' document on 16 January 2025.	This matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID3.3.22. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	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 Biodiversity [AS-026]**. Additional 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

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EIA – Assessment of Likely Impacts and Effects				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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 Biodiversity [AS-026]** do not restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1–10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated. The survey approach to bat roost surveys has been agreed with Natural England (the statutory responsible body for bats) and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on**	It would be useful transparency to advise on how long it is predicted to take for the long-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*	Under discussion

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		Relevant Representations [REP1-132] and at Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2–032].** The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	*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 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	

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			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 (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.	
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) is considered appropriate. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed

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3.3.13	Residual effects	The residual effects are presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The summary of residual effects arising as a result of the Project is considered appropriate. A detailed ecological impact assessment has been undertaken which covers designated sites, habitats and protected species, this is presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].** This assessment has been undertaken in accordance with CIEEM guidelines. Where potential effects as a result of the Project are unavoidable, appropriate mitigation has been provided within the 7.4 **Outline Landscape and Ecological Management Plan [REP3-030].** Monitoring has been included for replacement planting and within Environmental Areas as detailed within the **7.4 Outline Landscape and Ecological Management Plan [REP3-030].** Where monitoring of any protected species measures under licence are required, this will be outlined within the draft licensing documents agreed with Natural England. The Applicant has provided a response to this matter at Deadline 1 **in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Noted.	Agreed

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Specific Chelmsford Related Issues				
3.3.14	Great Waltham and Little Waltham	The Applicant has responded to the matter of replacement tree planting within Section 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Project has sought to minimise tree removal as far as practicable and to retain existing trees and woodlands wherever possible in accordance with paragraph 5.11.27 of NPS EN-1 (2024), tree loss will however result. A strategy for ancient woodland and veteran trees is provided within **7.4 Outline Landscape and Ecological and Management Plan Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032].** **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** contains a commitment to 3:1 replacement planting for individual trees and small groups of individual trees which will be secured within Requirement 4 of **3.1 Draft DCO [REP4-037]].** All other tree habitat is assessed and mitigated through the BNG metric and captured in **7.1 Biodiversity Net Gain Report [APP-299]**. While every effort has been made to deliver the commitment to 10% BNG through replacement planting and habitat creation/enhancement on site within the Order Limits, this commitment is not fully achievable on-site and therefore the deficit will be delivered through off-site habitat creation. The final veteran tree mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-	The proposal would lead to a considerable removal of trees, hedgerows and planting and has potential to impact upon Veteran trees which are irreplaceable habits. There is deep concern regarding the amount of vegetation proposed for removal. Pylons TB139 and TB140 would be sited close to the Conservation Area, which contains valued trees which could be removed should the proposal be granted. The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm. Loss to trees and woodland that has not been appropriately justified or mitigated at this stage in time. There is no appropriate mitigation for the loss of irreplaceable habitats. CCC consider that worst case scenarios should be provided to understand the full impact of the proposal. Particularly in the case of Langleys Deer Park and garden which is a national designation. CCC consider the current proposed mitigation is inadequate and a bespoke tree	Not agreed

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		by-case basis. This detail will be contained within the final LEMP which will be subject to approval by the relevant planning authorities under Requirement 4 of **3.1 Draft DCO [REP4-037]** **7.2 Outline Code of Construction Practice [REP4-164]** includes commitments to seek to retain trees as far as practicable, a commitment which will be adhered to during detailed design and construction of the Project. Requirement 8 of the draft DCO secures the submission of plans showing the trees and hedgerows to be retained and removed. The plans must be approved by the relevant planning authority prior to commencement of works on that stage. In addition, details of onsite reinstatement planting and planting associated with the 3:1 commitment for individual trees (outside the Environmental Areas) will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of the draft DCO, which is also subject to the approval of the relevant local planning authority. The local authority will therefore have oversight and ultimate approval of the tree removal and reinstatement plans through the draft DCO.	removal and replanting strategy for the Waltham Gap is required. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153 and comments to the first Written Questions REP3-075 Unless a bespoke removal and replanting strategy can be provided prior to close of examination, CCC consider that is unlikely that a mutually agreed position will be reached.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.15	Outline CoCP	The **7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**	CCC's response to the 2nd iteration of the draft oCOCP stated 'The CoCP and LEMP need to be fully consistent and not provide contractors with conflicting prescriptions. The Outline CoCP has been shared with ECC. ECC review expressed no major	Under discussion

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		and is appropriate for managing construction impacts from the Project. Section 1 of the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** states that it should be read alongside the mitigation measures described in the **7.2 Outline Code of Construction Practice [REP4-164].** Full details of the ECoW's qualifications / experience will be provided within the Final CoCP which is to be agreed with the relevant Planning Authorities. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further details on the ECoW can be found in the Applicant's response to BIO 1.26 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	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. 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	

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			required of a ECoW. One possibility mentioned was for an Ecology Advisory Board to review (and presumably vet?) and give approval for appointed ECoWs. With more detail, ECC is not adverse to this approach in principle.	
3.3.16	Outline LEMP	The **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and is appropriate. Section 1 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** states that it should be read alongside the mitigation measures described in the **7.2 Outline Code of Construction Practice [REP4-164].** Natural England (the statutory responsible body for bats) have approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility.	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 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.	Under discussion

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		The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above.		
Other matters as required				
3.3.17	Biodiversity Net Gain (BNG) - Onsite and assessment	The Applicant issued the 'Biodiversity Net Gain Assessment Strategy' document on 17 January 2025. Comments received from Essex Place Services (EPS) on the 'Biodiversity Net Gain Assessment Strategy' document on 6 February 2025 were taken on board for the BNG assessment in **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant is committed to delivering 10 % BNG with wider environmental and societal benefits on its construction projects. While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10% net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit. Further details on the long-term monitoring and management of BNG is provided in response to BIO 1.45 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved. This includes clarity on the application of the mitigation hierarchy, transparent accounting to avoid double-counting, governance and monitoring arrangements, and how on-site BNG delivery aligns with the Essex Local Nature Recovery Strategy. ECC considers that there must be confidence in the reinstatement planting being effective and achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur. CCC consider it is unlikely that the proposed BNG strategy will be resolved to CCC's satisfaction, given its preference for BNG to be delivered on site/ within the Chelmsford locality, so the matter is moved to Not Agreed.	Not agreed

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3.3.18	Biodiversity Net Gain (BNG) - Offsite	The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others. Full details of the offsite solution would be provided to the Local Planning Authorities post-consent. The Applicant has committed to 30 year monitoring and management at the Environmental Areas. **7.1 Biodiversity Net Gain Report [APP-299]** details the Applicant's approach and further details regarding the provision of off-site BNG are provided in response to BIO 1.47 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	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. CCC consider it is unlikely that the proposed BNG strategy will be resolved to CCC's satisfaction, given its preference for BNG to be delivered on site/ within the Chelmsford locality, so the matter is moved to Not Agreed.	Not agreed
3.3.19	Arboriculture Impact Assessment (AIA)	The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The tree planting strategy would prioritise replanting within the Order Limits, although off-site provision may be required. The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including**	The Arboricultural Impact Assessment is not in accordance with BS:5837:2012. There are omissions within the report and contradictory or limited references between the report and the accompanying plans, such that a full assessment of the impacts of the proposal cannot be carried out.	Not agreed

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		appendices B to K [APP-296] and is considered appropriate for this stage of the project. The accompanying plans have been updated to include tree labelling to match the tree schedule thus allowing a full assessment of the impacts to surveyed trees, see **Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].** Design has given consideration to the two veteran trees T908 and T909. Impacts are avoided for T908 and working areas adjusted to minimise encroachment to T909. At detailed design the Limits of Deviation may encroach on buffer zones, however these two veteran trees are assessed as retained with no loss to irreplaceable habitat. To protect retained trees, relevant protective principles as set out in BS 5837:2012 are to be provided following detailed design and detailed within an Arboricultural Method Statement by the main works contractor, see LV05 of **7.2 Outline Code of Construction Practice [REP4-164]** The Applicant has made a commitment to avoid impacts to ancient woodland and the associated 15 m buffer wherever practicable, within the **7.2 Outline Code of Construction Practice [REP4-164]**. In the rare occasion where complete avoidance of ancient woodland or the associated 15 m buffer has not been possible, appropriate mitigation has been proposed to ensure no residual effects. Full details on specific ancient woodland parcels present within range of the Project, the potential impacts (both within the woodland and within the 15m buffer) and the proposed mitigation measures are clearly set out within **7.4 Outline Landscape and Ecological**	CCC is concerned that the Ancient Woodland and Veteran Tree Strategy identifies a number of high ranking trees and features within category A that would be removed, together with a large loss of high priority habitats. It is understood that two veteran trees next to Langleys in Great Waltham may be removed. The reason for the removal of these trees is unclear, and the loss of irreplaceable habitat and the mitigation has not been adequately justified. A draft Arboricultural Method Statement should be produced to demonstrate what mitigation is required to appropriately protect retained trees. CCC is not convinced that NGET would be able to adhere to the standing advice from Natural England and Forestry Commission which proposes 15m buffer zones on distance between development and ancient woodlands. It is acknowledged that NGET is committed to replacement planting on a 3:1 ratio using stock of native species, yet there are concerns that this would not be appropriate to apply to all trees. Consideration needs to be given to veteran trees and woodland, which are by their very nature irreplaceable Reference needs to be given to failure rates.	

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		Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]. Requirement 8 of the draft DCO secures the submission of plans showing the trees and hedgerows to be retained and removed. The plans must be approved by the relevant planning authority prior to commencement of works on that stage. In addition, details of onsite reinstatement planting and planting associated with the 3:1 commitment for individual trees (outside the Environmental Areas) will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of the draft DCO, which is also subject to the approval of the relevant local planning authority. The local authority will therefore have oversight and ultimate approval of the tree removal and reinstatement plans through the draft DCO.	Bespoke planting strategy (including replacement / compensation is required for the Waltham gap. CCC is working with NGET and other Host Authorities to explore the provision of offsite planting within the Chelmsford administrative area and will report back to the ExA once further information becomes available. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC consider it is unlikely that CCC's concerns relating to the arboricultural impact assessment, buffer zones and planting, particularly within the Waltham Gap, will be resolved to CCC's satisfaction, so the matter is moved to Not Agreed.	
3.3.20	Tree replacement/ compensation	The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The tree planting strategy would prioritise replanting within the Order Limits, although off-site provision may be required. The Applicant welcomes ongoing engagement with CCC and other host authorities in relation to this matter.	CCC is working with NGET and other Host Authorities to explore the provision of offsite planting within the Chelmsford administrative area and will report back to the ExA once further information becomes available. CC consider that it is unlikely that the matter will be resolved to CCC's satisfaction, but the matter remains under discussion until deadline 7.	Under discussion

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3.3.21	Data sources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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. The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.	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). CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion
3.3.22	Survey Methodology (Bats)	All methodologies for surveying licensable species have been agreed with Natural England as evidenced within **5.9.13 Draft Statement of Common Ground – Natural England [REP1-034]**. The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken. 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.	Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECC believes further survey effort prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data- based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/compensation scheme. 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	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes a reasonable worst-case assessment of impacts on potential roost features. The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The Applicant considers that through the ongoing engagement between the parties, this matter can be proposed to be moved to Agreed	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. Confirmation of Natural England's position and their letter supporting the contents of the draft Project-wide licence would also be welcome.	
3.3.23	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The baseline conditions and receptors presented are considered appropriate. The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale as evidenced within **5.9.13 Draft Statement of Common Ground – Natural England [REP1-034]**. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.	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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.3.24	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-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. The mitigation approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale as evidenced within **5.9.13 Draft Statement of Common Ground – Natural England [REP1-034]**. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures.	Measure B16's assumption that any action requiring a Natural England derogation licence can be "*reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit*" is considered unsound. ECC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11. 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. Confirmation of Natural England's position and their letter supporting the contents of the draft Project-wide licence would also be welcome	Under discussion

3.4 Air Quality

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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant has provided a response to this matter at Deadline 1 through the **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. The Applicant has provided a response to this matter at Deadline 1 through the **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's full response set out in Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions rEP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. The key parameters and assumptions presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	CCC's main concern relates to the impact of the proposal upon the settlements and residents sited in proximity to the proposal. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP) and comments to the first Written Questions The matter will remain flagged as an area of concern, rather than agreed / disagreed, as impact upon amenity is a critical area of concern to CCC.	Area of concern
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		[APP-147]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	comments to the first Written Questions REP3-075	
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]** and set out in the **7.2 Outline Code of Construction Practice [REP3-025].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and provided further comment in relation to additional mitigation in Table 4.8 of Section 4.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.		
EIA – Assessment of Likely Impacts and Effects				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**. The assessment of effects during construction presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 The matter will remain flagged as an area of concern, rather than agreed / disagreed, as impact upon amenity is a critical area of concern to CCC.	Area of concern
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.		
3.4.12	Residual effects	The residual effects are presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147].** The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 The matter will remain flagged as an area of concern, rather than agreed / disagreed, as impact upon amenity is a critical area of concern to CCC.	Area of concern
Specific Chelmsford Related Issues				
3.4.13	Specific Chelmsford Related Issues	The Applicant acknowledges this error and it has been amended within the **8.1 Errata List [REP1-071]**.	There appears to be a mistake within the air quality documents. CCC believes that the monitoring station CM1 that is referred to is our Chignal St James monitoring station and not Thurrock Council's. CCC welcomes this clarification.	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.14	Outline CoCP	Dust management plans will be prepared prior to the construction of each planned work package for the Project and the final version will be submitted for approval in accordance with Requirement 4 of the **3.1 Draft Development Consent Order [REP4-037]**. As set out in **7.2 Outline Code of Construction Practice [REP4-164]**, dust monitoring locations will be agreed with the local planning authority. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	The Outline Dust Management Plan is set out in accordance with IAQM guidance. As such, the proposed methodology for working in relation to dust is broadly acceptable. This document is generic in form and it should be noted that there are no location specific assessments yet supplied for identifying and managing dust emissions at sensitive receptor locations CCC welcomes the provision of phased Dust Management Plans and would request that these are area specific. CCC is content to move this matter to agreed, subject to on-going engagement with the Applicant.	Agreed
Other matters as required				

3.5 Noise and Vibration

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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in **6.2 Environmental**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 14.2 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	comments to the first Written Questions REP3-075	
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The key parameters and assumptions presented are considered appropriate.	CCC's view is that there is a need for noise levels to be lower where the proposal is sited close to residential properties and urban receptors.	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** It is assumed that generators are included within temporary construction compounds. The assessment in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]** does not identify any potential significant effects from the operation of temporary construction compounds, including the use of generators. Generators, along with other noise sources within construction compounds, would be subject to additional detailed noise and vibration assessments by the Main Works Contractor(s). Following these assessments, specific mitigation measures would be identified and incorporated where required.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions REP3-075 CCC welcomes the clarification regarding the location of generators and other noise sources. The matter will remain flagged as an area of concern, rather than agreed / disagreed, as impact upon amenity is a critical area of concern to CCC.	
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** provides a further response to concerns on the proposed construction working hours.	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC's view is that there is a need for noise levels to be lower where the project is sited close to residential properties and urban receptors. At weekends, where overall noise levels are generally lower, there could be a perception that weekend working noise levels could appear higher.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that the construction hours schedule is inappropriate. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Noise and Vibration effects, are set out in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**.	It is noted only embedded mitigation is proposed. There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. CCC is concerned that the embedded mitigation measures do not sufficiently address the additional noise risks associated with: • Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; • Extensive proposed working hours, including nights, weekends and bank holidays;	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**.	• The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in **Section 14.6** of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** and set out in **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. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will	It is noted only embedded and standard mitigation is proposed. There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**.	satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.5.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** Operational noise from the overhead line was scoped out of the Environmental Statement on the basis that a low noise conductor system is proposed. Based on the proposed conductor system, adverse effects are not expected, even directly underneath the line.	It is noted only embedded and standard mitigation is proposed. There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. Given the uncertainties in the noise assessment methodology, the lack of secured receptor-specific mitigation, and the risks associated with flexible working hours and Limits of Deviation, CCC is	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Although scoped out, further information on noise from the proposed overhead line is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [APP-261]**. Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**.	concerned that additional mitigation will be required in practice. CCC notes that although adverse effects are not expected, CCC asks what would happen if effects are found to occur upon operation and how could these be mitigated? CCC queries what mechanisms exist to safeguard against adverse effects if / where these are found? Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Assessment of Likely Impacts and Effects				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The assessment of effects during construction presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in relation to Windmill House in ID 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours. The Applicant considers that the proposed approach presents a balance between providing the appropriate levels of flexibility to maintain programme whilst retaining safeguards through DCO controls to manage impacts included in **7.2 Outline Code of Construction Practice [REP4-164]**, including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. The proposed hours of 07:00 to 19:00 Monday – Fridays and 07:00 am to 17:00 over weekends/holiday raise concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC. Currently it is not clear how noise levels would be affected, should the pylons be relocated in accordance with the Limits of Deviation. This is particularly concerning, with regard to the installation of lower height pylons at Great Waltham and Little Waltham, where the LOD allow for the movement and installation of full height pylons close to Windmill House and properties sited along Chelmsford Road. CCC considers that the working hours proposed—07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and Public Holidays, plus up to an additional hour either side for start-up and close-down—are excessive and offer insufficient respite for Noise Sensitive Receptors (NSRs).	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Requirement 7 of the draft DCO, when combined with Requirement 7(5) start-up/close-down provisions and Requirement 7(4) allowances for activities outside core hours, creates a 16-hour daily operational envelope with no enforceable upper noise limit during those periods. This substantially increases the likelihood of material adverse effects on residential amenity, health and wellbeing. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC welcomes further engagement upon this matter. CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** With regards to construction noise from pylon construction, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [REP4-164]**. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP). Operational noise from the overhead line was scoped out of the Environmental Statement on the basis that a low noise conductor system is proposed. Based on the proposed conductor system, adverse effects are not expected, even directly underneath the line. Although scoped out, further information on noise from the proposed overhead line is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [APP-261]**.	CCC is concerned about the impact of the proposal upon those properties. Post noise impacts will be long standing and permanent and may not be perceived by those living close to the pylons as acceptable. The Limits of Deviation enable the movement of pylons along the Overhead Line. Noise receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm to residents amenities. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153-) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.5.12	Residual effects	The residual effects are presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The summary of residual effects arising as a result of the Project is considered appropriate.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
Specific Chelmsford Related Issues				
3.5.13	Specific Chelmsford Related Issues	The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in relation to Windmill House in ID 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. As noted above, Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours. Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties, particularly Windmill House in Great Waltham. The Limits of Deviation enable the movement of pylons along the Overhead Line. Noise receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm to residents' amenities. The proposed hours of 07:00 to 19:00 Monday – Fridays and 07:00 am to 17:00 over weekends/holiday raise concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC. In Chelmsford normal working hours are 08:00 to 13:00 on Saturdays, with no working on Sundays or bank holidays. CCC is concerned that the embedded mitigation measures do not sufficiently	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	address the additional noise risks associated with: • Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; • Extensive proposed working hours, including nights, weekends and bank holidays; • The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.14	Outline CoCP	**7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant mitigation measures specified in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** and is appropriate for managing construction impacts from the Project.	This matter was still under discussion pending further review of the Outline CoCP Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-075) and	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**.	comments to the first Written Questions REP3-075 CCC is concerned that the CoOP does not address / incorporate matters including the following: Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; Extensive proposed working hours, including nights, weekends and bank holidays; The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
Other matters as required				
3.5.15	Hours of working	As noted above, Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours.	The proposed working hours of 07:00 to 17:00 across weekends and holidays is not considered acceptable. In Chelmsford normal working hours are 08:00 to 13:00 on Saturdays, with no working on Sundays or bank holidays.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**. The detailed assessment will take account of specific works locations within the LoD, and the proposed working periods and durations. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [REP4-165]**), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [REP4-165]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	

3.6 Health and Wellbeing

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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 10.2 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. This includes the Chelmsford Local Plan 2013 to 2036 (adopted 2020) as referenced in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]**. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Approach and Methods				
3.6.2	Study area	The study area was agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024. The study area was agreed through **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.6.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Not agreed
3.6.4	Assessment methodology	WHIASU guidance has been used in relation to the identification of vulnerable groups in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**.	CCC requested that reference to WHIASU guidance and vulnerable groups checklist is included within the assessment which was agreed by National Grid. CCC welcomes the inclusion of this guidance	Agreed
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The key parameters and assumptions presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on**	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Relevant Representations [REP1-132] and in ID 8.154 and 11.12 and 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA), contains an assessment of the impacts on visual amenity for properties within 200m of the Project centreline. This recognises that a number of properties within the RVAA study area would experience a high magnitude of visual change as a result of the Project, but determined that the Residential Visual Amenity Threshold (RVAT) would not be breached at any of these locations. Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	CCC is concerned about the impact of the proposal upon those properties, Visually, the siting of pylons close to residential properties would have a harmful and unacceptable impact upon the occupant's amenities, both visually and spatially, where the pylons would have an overbearing and dominant impact upon the properties. It is noted that a number of properties are sited less than 200 metres away from the proposed pylons and overhead lines and would be noticeable and potentially overbearing. The Limits of Deviation enable the movement of pylons along the Overhead Line. Noise receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm to residents amenities. The proposed hours of 07:00 to 19:00 Monday – Fridays and 07:00 am to 17:00 over weekends/holiday raise concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC. In Chelmsford normal working hours are 08:00 to 13:00 on Saturdays, with no working on Sundays or bank holidays. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	It is noted that only embedded mitigation is proposed. CCC is concerned that the embedded mitigation measures do not sufficiently address the additional noise risks associated with: • Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; • Extensive proposed working hours, including nights, weekends and bank holidays; • The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC welcomes further discussion of this matter	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.6.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** 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. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.154 and 11.12 and 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	CCC notes that no mitigation is proposed beyond embedded measures. There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	Not agreed
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 Wellbeing [APP-192]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on**	The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Relevant Representations [REP1-132] and in ID 8.154 and 11.12 and 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In regard to comments made relating to a Health and Wellbeing Monitoring Framework, the Applicant has addressed these within Table 4.14 of Section 4.8 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	CCC is concerned about the impact of the proposal upon those properties. Given the scale and duration of construction and the socio-economic characteristics of affected communities, CCC recommends consideration of establishing of a Health and Wellbeing Monitoring Framework to promote best practice. This Framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC is disappointed with the Applicants decision not to enter into a Health and Wellbeing Monitoring Framework. Just because an effect is not deemed to be significant, does not mean that it will not be felt by affected residents. The use of a Health and Wellbeing Framework as a means of good practice, would show a clear commitment from the Applicant that they are genuinely engaged in the health and welfare of affected residents and other affected receptors.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
EIA – Assessment of Likely Impacts and Effects				
3.6.10	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The assessment of effects during construction presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.154 and 11.12 and 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. The proposed hours of 07:00 to 19:00 Monday – Fridays and 07:00 am to 17:00 over weekends/holiday raise concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC CCC is concerned that the embedded mitigation measures do not sufficiently address the additional noise risks associated with: • Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; • Extensive proposed working hours, including nights, weekends and bank holidays; The lack of receptor-specific embedded mitigation, such as temporal restrictions at	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.6.11	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 Wellbeing [APP-192].** The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.154 and 11.12 and 8.158 of Table 4.20 of **Section 4.11** of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In regard to comments made relating to a Health and Wellbeing Monitoring Framework, the Applicant has addressed these within Table 4.14 of Section 4.8 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**.	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. CCC is concerned about the impact of the proposal upon those properties. The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. CCC recommends consideration of establishing of a **Health and Wellbeing Monitoring Framework to promote best practice.** This Framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP-075 CCC is disappointed with the Applicants decision not to enter into a Health and Wellbeing Monitoring Framework. Just because an effect is not deemed to be significant, does not mean that it will not be felt by affected residents. The use of a Health and Wellbeing Framework as a means of good practice, would show a clear commitment from the Applicant that they are genuinely engaged in the health and welfare of affected residents and other affected receptors. CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
3.6.12	Residual effects	The residual effects are presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192].** The summary of residual effects arising as a result of the Project is considered appropriate. The **7.8 Electric and Magnetic Field Compliance Report [APP-330]** details the electric and magnetic field (EMF) assessment for the Project, demonstrating compliance with the requirements of National Policy Statement EN-5 in line with the requirements of the	The effect and impact of Electro Magnetic Field (EMF) are material to the consideration of the proposal; which should not be granted unless the ExA is satisfied that the proposal is compliant with all relevant legislation.	Agreed to defer to ExA

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		government's Code of Practice Power Lines: Demonstrating compliance with EMF public exposure guidelines. This demonstrates that when directly under the overhead lines or directly above the underground cables the International Commission on Non-Ionizing Radiation Protection exposure limits are not exceeded. Any offset from the overhead line or cables reduced the EMF levels significantly ensuring compliance at any distance from the assets. The Applicant considers that through ongoing engagement between the parties, that they both seek to defer to ExA.		
Specific Chelmsford related issues				
3.6.13	Specific Chelmsford related issues	The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.158 of Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. After consideration of feedback during consultations in 2025, the three low height pylons which were proposed closest to Windmill House have been changed to two standard lattice pylons and will be moved further away from the house. The increased span between the pylons and distance from the house would reduce expected effects on visual amenity at this property. Effects on Windmill House are assessed on page 94 of Table A13.4.3 and on page 167 of Table A13.4.42 within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Part 1 of 2 [APP-233]**.	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. These include Windmill House within Great Waltham. CCC is concerned about the impact of the proposal upon those properties. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP) and comments to the first Written Questions. In principle, upon amenity grounds relating to Windmill House only, the siting of the pylons further away from Windmill House as shown in the alternative proposal is welcomed.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Yet, in relation to Great Waltham and Little Waltham, CCC is concerned that the embedded mitigation measures do not sufficiently address the additional noise risks associated with: • Flexible Limits of Deviation (LoD) which may bring noisy works closer to receptors than assessed; • Extensive proposed working hours, including nights, weekends and bank holidays; • The lack of receptor-specific embedded mitigation, such as temporal restrictions at pylon locations, firm commitments on screening, alternative methods or acoustic enclosures. CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.14	Outline CoCP	The **7.2 Outline Code of Construction Practice [REP4-16]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** and is appropriate for managing construction impacts from the Project.	CCC remain concerned that some matters within the outline CoCP, that rely on other matters such as construction hours, have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.6.15	Health and wellbeing monitoring framework	In regard to comments made relating to a Health and Wellbeing Monitoring Framework, the Applicant has addressed these within Table 4.14 of Section 4.8 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. Given the scale and duration of construction and the socio economic characteristics of affected communities, CCC recommends consideration of establishing of a Health and Wellbeing Monitoring Framework to promote best practice**.** This Framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities. CCC is disappointed with the Applicants decision not to enter into a Health and Wellbeing Monitoring Framework. Just because an effect is not deemed to be significant, does not mean that it will not be felt by affected residents. The use of a Health and Wellbeing Framework as a means of good practice, would show a clear commitment from the Applicant that they are genuinely engaged in the health and welfare of affected residents and other affected receptors. CCC remain concerned that these matters have not / are not being resolved to CCC's satisfaction. It is unlikely that we will reach a mutually agreed position and the matter is moved to not agreed.	Not agreed

3.7 Historic Environment

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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	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 Context [APP126]** 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.	Agreed	Agreed
3.7.2	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 Context [APP-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. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	CCC defers to ECC Archaeology. ECC (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: **6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209]** we are able to agree this matter.	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Approach and Methods				
3.7.3	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	Agreed
3.7.4	Data sources Designated Heritage Assets (DHAS)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].** The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**	Agreed. As set out in CCC's final Local Impact Report REP1 – 153 and responses to Written Questions REP3-075	Agreed
3.7.5	Data sources Non Designated Heritage Assets (NDHAs)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].** The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and the Applicant's position has been set out in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. 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.	The data source is inadequate for built non designated heritage assets and non designated landscape (Coptfold Hall). CCC's full response is set out in its LIR REP1-153 and response to written questions REP3-075 This is a matter of disagreement. We have not been able to reach a mutually agreed position.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.7.6	Data sources (archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**.	ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026.)	Agreed
3.7.7	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 Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project. It is intended to submit the 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 Information [AS-068 to AS-083]. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork was largely completed in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.	CCC defers to ECC Archaeology. 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 bene provide by the Applicant to inform an appropriate assessment of the proposed development.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.		
3.7.8a	Assessment methodology (Built Heritage)	The methodology for assessing Historic Environment was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. It is considered that the assessment methodology has been agreed, with the exception of non-designated heritage assets, where the method is still under discussion. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. As the comment from the Council indicates that the assessment methodology for designated built heritage assets is agreed the Applicant proposes that this matter is moved to agreed with the disagreement on non-designated heritage asset methodology and assessment conclusions captured below.	The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and November 2024. All relevant designated heritage assets within the 2km and 3km zones are identified. The methodology for assessment is supported. In spite of this, the proposal underestimates the impacts on many designated heritage assets, with additional impacts identified by CCC in its LIR REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	Not agreed
3.7.8b	Assessment methodology (Built Heritage – Non-designated heritage assets)	All non-designated heritage assets were assessed to determine their value in accordance with the Scoping Report [APP-288 – APP-296], Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Those assets assessed to	CCC disagrees with the methodology for selecting and assessing non-designated heritage assets. Further assessment is required.	Not Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		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. 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.	Protected lanes are identified, but their settings are not considered. This is particularly important at Larks Lane, Paulk Hall and Goodmans Lane. Some locally listed buildings are included, but designed landscapes and other buildings and features of sufficient interest to be considered as non-designated heritage assets are not comprehensively identified and should fully inform the assessment baseline. These include the following: • Coptfold Hall locally designated landscape CCC's full response is set out in its final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	
3.7.9	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	ECC on behalf of CCC is in agreement with this matter.	Agreed
3.7.10	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment - [AS-068]**. The key parameters and assumptions presented are considered appropriate.	CCC does not agree with the methodology for assessing non-designated heritage assets. CCC's full response is within CCC's final Local Impact Report REP1-153 and response to written questions REP3-075	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant's response regarding the non-designated built heritage asset methodology is set out in matter 3.7.8b above. As the key parameters and assumptions section of 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] does not specifically reference non-designated built heritage assets the Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	We have not been able to reach a mutually agreed position.	
3.7.11	Key parameters and assumptions (Archaeology)	The fieldwork undertaken to date (see response to 3.7.7) comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The Applicant has provided a response to this matter at Deadline 3 is response to HE 1.43 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been 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**	CCC defers to ECC archaeology. 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 bene provide by the Applicant to inform an appropriate assessment of the proposed development	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Consent Order [REP4-037] and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]**, of which the historic environment stakeholders are aware. Further details can be found in response to ID 4.13.25 and 8.238 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
EIA – Baseline Conditions				
3.7.12	Baseline conditions and receptors (Built Heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment - [AS-068]**. The baseline conditions and receptors presented are considered appropriate.	CCC disagrees with the methodology for selecting and assessing non-designated heritage assets. Further assessment is required.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and provided further response regarding assessment of non-designated heritage assets in response to ExQ1 HE 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and protected lanes in **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]**. The Applicant has undertaken a detailed assessment of the historic environment which considers the potential for impact on designated and non-designated heritage assets, including locally listed buildings, protected lanes, designed and historic landscapes, and other features of heritage interest. As a low value asset, the setting of the Protected Lane was not considered. Please refer to ID 8.204 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for further details. As a low value asset, the setting of the Coptfold Hall designed landscape would not have been considered. Please refer to ID 8.207 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for further details. The **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** treats the seven WWII pillboxes and the General Headquarters Defence Line as a single medium value heritage asset and assesses its setting.	Protected lanes are identified, but their settings are not considered. This is particularly important at Larks Lane, Paulk Hall and Goodmans Lane. Some locally listed buildings are included, but designed landscapes and other buildings and features of sufficient interest to be considered as non-designated heritage assets are not comprehensively identified and should fully inform the assessment baseline. These include the following: • Coptfold Hall locally designated landscape CCC's full response is set out in its final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	

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		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.		
3.7.13	Baseline conditions and receptors (Archaeology)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment - [AS-068]**. The baseline conditions and receptors presented are considered appropriate.	ECC on behalf of CCC agreed this matter during call in January 2026.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.14a	Embedded mitigation (built heritage)	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment) [AS-068]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in **7.2 Outline Code of Construction Practice [REP4-164]** and **7.4 Outline Landscape and Ecological Management Plan [REP3-030].** The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the	Built Heritage CCC Considers the embedded mitigation is insufficient. 'Mitigation generally should ensure that land take is sufficient to allow for a range of mitigation options, for instance landscaping - potentially from closing up gaps in hedges to large scale woodland planting where necessary. Where harm is unavoidable heritage compensatory measures should also be delivered, for instance repair of listed buildings and/or associated built and landscape features to offset harm to setting. The Project includes no heritage mitigation. Embedded mitigation should be provided at all affected heritage assets Where significant harm has been identified further mitigation measures should be employed to reduced or limit or offset the	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful change, as set out in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures. Please refer to response to ID 3.7.23 and 3.7.24 regarding the impact of specific heritage assets. 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	level of harm. In most cases this will involve positioning the Order Limits, associated access roads and pylons further away from heritage assets to limit the impact on the rural surroundings and how assets are experienced. Mitigation would be essential at Grade 1 listed Langleys, where there are a number of structures and features within the Registered Park and Garden, as well as the outbuildings and the house, which could have funded repairs to offset the acknowledged harm to the setting.' There is a heritage hotspot at Great Waltham and Little Waltham. CCC has concern in relation to the choice of the design approach for the proposed for the area. CCC would reiterate its preference for a alternative design to be used in this location. Further information in relation to CCC's view on design principles can be found in Section 3.2.5. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and s final Local Impact Report REP1-153 and response to written questions REP3-075. We have not been able to reach a mutually agreed position.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.7.14a	Embedded mitigation (archaeology)		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 Report [APP-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.	Not agreed
3.7.15	Standard mitigation (Built Heritage)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**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.	CCC Considers the mitigation is insufficient. 'Mitigation generally should ensure that land take is sufficient to allow for a range of mitigation options, for instance landscaping - potentially from closing up gaps in hedges to large scale woodland planting where necessary. Where harm is unavoidable	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in **7.2 Outline Code of Construction Practice [REP4-164]** and **7.4 Outline Landscape and Ecological Management Plan [REP3-030].** The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful change, as set out in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures.	heritage compensatory measures should also be delivered, for instance repair of listed buildings and/or associated built and landscape features to offset harm to setting. The Project includes no heritage mitigation. Mitigation should be provided at all affected heritage assets Where significant harm has been identified further mitigation measures should be employed to reduced or limit or offset the level of harm. In most cases this will involve positioning the Order Limits, associated access roads and pylons further away from heritage assets to limit the impact on the rural surroundings and how assets are experienced. Mitigation would be essential at Grade 1 listed Langleys, where there are a number of structures and features within the Registered Park and Garden, as well as the outbuildings and the house, which could have funded repairs to offset the acknowledged harm to the setting.' There is a heritage hotspot at Great Waltham and Little Waltham. CCC has concern in relation to the choice of the design approach for the proposed for the area. CCC would reiterate its preference for an alternative design to be used in this location.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Please refer to response to ID 3.7.23 and 3.7.24 regarding the impact of specific heritage assets. 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	Further information in relation to CCC's view on design principles can be found in Section 3.2.5. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	
3.7.16	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and set out in **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 (Archaeology) on behalf of CCC agreed this matter during call held January 2026.	Agreed
3.7.17	Additional mitigation (Built Heritage)	The consideration of additional mitigation measures is 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. The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in	CCC Considers the mitigation is insufficient. 'Mitigation generally should ensure that land take is sufficient to allow for a range of mitigation options, for instance landscaping - potentially from closing up gaps in hedges to large scale woodland planting where necessary. Where harm is unavoidable heritage compensatory measures should also be delivered, for instance repair of listed buildings and/or associated built and landscape features to offset harm to setting.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		7.2 Outline Code of Construction Practice [REP4-164] and **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful change, as set out in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070].** Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures. Please refer to response to ID 3.7.23 and 3.7.24 regarding the impact of specific heritage assets. 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	The Project includes no heritage mitigation. Mitigation should be provided at all affected heritage assets. Where significant harm has been identified further mitigation measures should be employed to reduced or limit or offset the level of harm. In most cases this will involve positioning the Order Limits, associated access roads and pylons further away from heritage assets to limit the impact on the rural surroundings and how assets are experienced. Mitigation would be essential at Grade 1 listed Langleys, where there are a number of structures and features within the Registered Park and Garden, as well as the outbuildings and the house, which could have funded repairs to offset the acknowledged harm to the setting.' There is a heritage hotspot at Great Waltham and Little Waltham. CCC has concern in relation to the choice of the design approach for the proposed for the area. CCC would reiterate its preference for a alternative design to be used in this location. Further information in relation to CCC's view on design principles can be found in Section 3.2.5. Additional mitigation should be provided at all affected designated heritage assets	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			including Church of St Mary, Buttsbury, Margaretting Hall, White Tyrells Farmhouse, South Woods Farm and Balls Farm. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	
3.7.17a	Additional mitigation (Archaeology)	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment (Rev B) [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 Investigation [APP-328]** with the intention that any further comments can be addressed and included for submission at Deadline 5. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	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.	Agreed
EIA – Assessment of Likely Impacts and Effects				
3.7.18	Construction effects	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment -**	CCC has a number of concerns relating to the construction of the proposal and its effect on the built heritage. CCC is	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
	(Built Heritage)	**[AS-068]**. The assessment of effects during construction presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** 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.	particularly concerned regarding the effect upon the Ingatestone Bridge and Grade 1 listed Langleys. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	
3.7.19	Construction effects (archaeology)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The assessment of effects during construction presented is considered appropriate.	Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed
3.7.20	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 Environment [AS-068].** The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.199 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful	CCC has significant concern regarding the impacts on designated and non-designated heritage assets at Little Waltham and Great Waltham, where the route passes between the two historic villages.' Concerns also raised regarding other locations and lack of mitigation proposed. CCC consider that landscape planting should be introduced within affected areas to help screen the pylons from affected assets. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		change, as set out in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070].** Requirement 8 of the draft DCO secures the submission of plans showing the trees and hedgerows to be retained and removed. The plans must be approved by the relevant planning authority prior to commencement of works on that stage. In addition, details of onsite reinstatement planting and planting associated with the 3:1 commitment for individual trees (outside the Environmental Areas) will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of the draft DCO, which is also subject to the approval of the relevant local planning authority. The local authority will therefore have oversight and ultimate approval of the tree removal and reinstatement plans through the draft DCO. 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.	Report REP1-153 and response to written questions REP3-075 CCC consider the matter of landscape planting has not been fully explored to CCC's satisfaction. The siting of the pylons would lead to harmful change, rather that the addition of planting, which is a standard mitigation measure in certain cases. To avoid this harmful change, CCC would reiterate its preferences for alternatives to be used within the Waltham Gap. We have not been able to reach a mutually agreed position.	
3.7.21	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Requests have been made for the area at the Walthams to be treated as a priority for further archaeological assessment once the undergrounding sections (regarded by National Grid as Priority areas) have been completed. Following review of the ES, ECC on behalf of CCC confirmed agreement on this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.7.22	Residual effects	The residual effects are presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].** The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** 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.	Much of the detailed heritage assessment, including the levels of significance and impacts are concurred with. There are some areas where the findings are not agreed or the evidence base is not complete. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	Not agreed
Specific Chelmsford related issues				
3.7.23	Great Waltham and Little Waltham	The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in ID 8.201 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The impact of the Project on the setting of these assets was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and in accordance with professional heritage sector guidance. **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** describes the setting of the assets with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment for Great Waltham and Little Waltham conservation areas and considers that the	CCC has concerns around heritage throughout the breadth of the project area. There are numerous affected areas. There is a hotspot between Great Waltham and Little Waltham. From a heritage perspective, the most sensitive area on the route is that between the villages of Great Waltham and Little Waltham, where the route would pass between two Conservation Areas, Langleys Registered Park and Garden and the setting of the Grade I listed house Langleys, the Ash Tree Corner Scheduled Monument, the Church of St Mary and St Lawrence (Grade I) and 65 Grade II listed and two Grade II* buildings within 1km,	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		assessment of permanent minor adverse significance of effect (not significant) (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and Lower Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line. The assessment in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded lower less than substantial harm for Great Waltham and Little Waltham conservation areas during construction and operation phases of the Project. The Applicant still considers this assessment to be appropriate for the reasons set out in the assessment. The assessment concluded mid less than substantial harm during construction and operation to Langleys Registered Park and Garden (RPG). The proposed use of lower height pylons secures a position where heritage effects will result in less than substantial harm at the Grade I Langleys and RPG. Please refer to ID 8.199 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for further details. 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.	also numerous non-designated heritage assets including pillboxes associated with the GHQ defence line and various vernacular buildings. Most of these heritage assets have a rural setting which contributes to their significance. Non-significant impacts are identified to many listed buildings within the setting of Little Waltham and Great Waltham. The proposal would impact upon a number of non-designated heritage assets within the routes vicinity. CCC assess the impacts to Great Waltham (CA55) and Little Waltham (CA56) as moderate and thus significant. Langleys Registered Park and Garden (1000241) is the only RPG where there are agreed moderate and thus significant effects. The pylons would irreversibly destroy the unique and irreplaceable historic environment of the setting of the Langleys leading to significant adverse heritage impacts that are not adequately mitigated. Proposed lower height pylons (TB136 and TB142) are proposed as lower height pylons by NG. Whilst the lower height limit their visibility above trees when seen in the context of tree belts, they would have a similar or greater visual presence in exposed locations due to their wider stance and thicker structural sections. This would be the case from Grade I listed Langleys's House.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			CCC welcome the introduction of the Alternative Scheme but need further information to understand the heritage impacts of the proposal in this location. The cumulative impact of identified low level harm on the historic environment within Great Waltham and Little Waltham would be extensive. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and draft Local Impact Report shared for Policy Board on 15th January 2026. Further comments are provided within CCC's final Local Impact Report REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	
3.7.24	Alternative pylon route to west of Great Waltham	The Applicant has provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant notes Chelmsford City Council's preference but is required to develop proposals in line with national policy and its regulatory requirement. The **5.15 Design Development Report [APP-122]** considered around Great and Little Waltham: alternative route alignments (from paragraph 9.2.2); other pylon types (from paragraph 9.2.8); and the use of underground cable (from paragraph 9.2.17). Alternative routes were considered less preferred (fifth bullet paragraph 9.2.4), the use of a number of low height lattice pylons was beneficial (paragraph	CCC would reiterate its preference for the route of the pylons to be sited to the west of Great Waltham and Little Waltham. That proposal would have less heritage impacts than the proposed Project. CCC's full response is set out in its Relevant Representations dated 27 November 2025 and final Local Impact Report. REP1-153 and response to written questions REP3-075 We have not been able to reach a mutually agreed position.	Not agreed

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		9.2.16) but the costs and effects of underground cable are not justified (paragraph 9.2.23). 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.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.25	Outline CoCP (Built Heritage)	The **7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction mitigation measures specified in 6.11 **Environmental Statement Chapter 11 - Historic Environment [AS-068]** and is appropriate for managing construction impacts from the Project. The Applicant has provided a response to this matter in ID 8.281-2.282 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of **7.2 Outline Code of Construction Practice [REP4-164]**. Commitment H06 in **7.2 Outline Code of Construction Practice [REP4-164]** issued at Deadline 2 was updated to: 'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of	Under discussion. Mitigation for Protected Lanes is included under H06. In order to protect the historic features of the protected lane a permanent record should be completed prior to any changes which would allow more accurate re-instatement. The requirement for this should be included under H06 and the mode and mechanism for this process included in the final Landscape and Ecological Management Plan (LEMP). See also response to written questions REP3-075 (protected lanes) Clarification and a response to CCC's comments are needed here, before we can reach an agreed position.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).' The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.7.26	Outline CoCP (Archaeology)	**7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and is appropriate for managing construction impacts from the Project. Commitment H04 in **7.2 Outline Code of Construction Practice [REP4-164]** was updated at Deadline 2 to include the following: 'The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.' The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	CCC defers to ECC archaeology. 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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.7.27	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	The Applicant shared overarching WSIs in March – June 2024 and December 2024. 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.	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.28	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
3.7.29	Outline Archaeological Mitigation Strategy and Outline WSI.	The contents of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** is considered appropriate and proportionate to the level of evaluation required. The Applicant issued the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** 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 Investigation [APP-328] with the intention that any further comments can be	CCC defers to ECC Archaeology. 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 Investigation [APP-328]** which is scheduled for submission at Deadline 5	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		addressed and included for submission at Deadline 5. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed, and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ should highly significant remains be identified. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
3.7.30	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	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		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.		
3.7.31	Supplementary Environmental Information	The Applicant acknowledges and welcomes agreement on this matter.	ECC is in agreement with this matter.	Agreed

3.8 Landscape and Visual

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

ID	Matter	National Grid's Position	Chelmsford City 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 Landscape and Visual Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual APP-226]**. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	CCC suggest that reference be made to Overarching National Policy Statement for Energy (EN-1) Para 4.3.4 in relation to compensation for significant negative impacts 'To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Section 3.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** also sets out the Applicant's approach to the duty under section 85(1) of the CRoW Act.	compensated for, following the mitigation hierarchy'. This matter is considered under discussion. Further consideration is to be considered around compensation as is identified in National Policy. It is noted that this approach is not justified where there are significant visual impacts across the scheme. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC defers to ECC Place Services.	
EIA – Approach and Methods				
3.8.2	Study area	The study area for assessing Landscape and Visual was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic workshops.	The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.	Agreed
3.8.3	Study area (Viewpoints)	The locations of viewpoints are shown on 6.13.F7 **Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]** and associated baseline views are presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Parts 1 to 4 of 4 [APP-229 to APP-232]**.	CCC confirmed in meeting regarding the Statement of Common Ground on 29 January 2026 that this matter is considered under discussion CCC defers to ECC Place Services.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided responses to concerns raised regarding viewpoints in Appendix H of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023])** and also in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**		
3.8.4	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	CCC remain unsatisfied with the number of viewpoint assessments proposed generally (Email November 2024). Whilst CCC welcome the inclusion of criteria against which landscape value will be assessed, they remain unhappy with aspects of the approach to Landscape Value assessment (Email 22.04.2025) this matter is considered under discussion with no change in position identified. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC defers to ECC Place Services.	Under discussion
3.8.5	Assessment methodology (including LVIA methodology)	The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops. A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28 November 2024 to follow up any additional changes. At Statutory Consultation,	Whilst CCC welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025). There is concern that the value assessment has been carried out just at a character area level rather than looking at the details of the landscape value within the Order Limits and their	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		CCC requested the inclusion of a Valued Landscape Assessment. The Applicant proposed to consider valued landscape qualities in the LVIA but did not propose to undertake a separate valued landscape assessment. The assessment methodology is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The Applicant has provided responses to concerns raised in Appendix H of 8.4.1 Applicant's Comments on Relevant Representations **[REP2-023]** and also in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	setting. This could result in the downplaying of specific qualities and value related to the development corridor itself. With regard to the landscape value assessments, there are concerns that the detailed assessments identified in Annex A to Appendix 13.2: Landscape Baseline and Assessment appear to undervalue factors, particularly in relation to 'Distinctiveness', 'Perceptual' and 'Functional' criteria. It does not appear as though the effects of the proposal on national or regional landscape character have been assessed. Generally the viewpoint assessments are welcomed by CCC, but there are still considerable gaps in the provision including VRA F9 Edney Common (Longer distance) and VRA F6 Chelmsford North-West (Longer distance) The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network in particular. CCC considers that the visual assessment should more explicitly extend into sensitive areas beyond the 3Km line in order to demonstrate the effects are not significant. It is not agreed that the value of the view should be judged substantially on identified viewpoints and promoted views in tourist-focussed documents and that in lieu of local landscape designation and district-wide Valued Landscape Assessments. The	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			value of the view should be judged by how it relates to the LCA. It is considered the sensitivity of receptors and significance of the effects has been downplayed as a result of the approach taken. CCC also have reservations regarding the methodology for assessing the value of views as this appears skewed towards published data. At that this matter is considered under discussion. Noted that there was concern around the use of the Holford Rules as an out of date metric in relation to landscape values, which has led to a potential issue when considering the design especially around river valleys. Further consideration is highlighted in the design and principles section 3.2. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
3.8.6	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in paragraph 13.4.20 of Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The key parameters and assumptions presented are considered appropriate.	The preliminary key parameters and assumptions are presented at 13.5 in relation to LVIA. It is understood 'This information is iterative and will be updated for the ES as the design evolves and relevant changes are accounted for in the assessment'. CCC/ reserve the right to comment further should the parameters and assumptions change.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Paragraph 13.2.9 of Document 6.13.A2 Environmental Statement Appendix 13.2 Landscape Baseline and Assessment states, there are no locally designated landscapes within the 3 km Study Area', without reference to the fact that the districts through which the Project line passes no longer designate landscapes locally, in keeping with National policy from the late 1990s and 2000s. The lack of local landscape designation does not imply lack of landscape qualities or value. The current Holford Rules advise 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.' There is concern that the landscape value criteria evaluation is flawed. 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. The landscape value assessment was not made available until the submission of the ES and so has not, to our knowledge, informed the alignment in any meaningful way. It is considered the proposed alignment needs to be looked at again in light of this data.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			This matter is considered under discussion. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
EIA – Baseline Conditions				
3.8.7	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided responses to concerns raised in Appendix H of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and also in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	CCC remain unsatisfied generally with the number of viewpoint assessments proposed as previously outlined. CCC/welcome the inclusion of criteria against which landscape value will be assessed but remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025) and therefore the outcome in terms of the baseline. CCC also have reservations regarding the methodology for assessing the value of views. An approach to compensation not just mitigation needs to be identified to meet the EIA Regs and EN-1 requirements and to meet the test of 'as far as possible'. CCC have been calling for engagement on this issue since 2023. Further comments will be made upon receipt of the ES and a full response will be given within CCC's Local Impact Report.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			This matter is considered under discussion. Noted concerns around scale of visual receptor areas. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.8	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 - Project Description [APP-130]** and also Paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Landscape – adequacy of undergrounding, mitigation and lack of compensation are all still under discussion. CCC concerns regarding the setting of Grade II 'Langleys' Registered Park and Garden and both Great Waltham and Little Waltham Conservation Areas remain unresolved. Although the repositioning of 3no. pylons (TB136, TB142 and TB140) and the use of 'lower height pylons' for 7no locations (TB136 to TB142) is considered to have comparable overall effects, the use of alternative design has been requested. Alternative routing has been discussed. The Holford Rules are out of date on the issue of locally designated landscapes and do not capture the concept of valued landscapes. These haven't been reviewed since the 1990s. Since then, landscape characterisation has become the tool for understanding landscape and guidance on	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			valued landscape assessment outside designated landscapes introduced. Even if 'policy statement EN-5 (which covers the development of new energy infrastructure) … concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid' it doesn't follow that there are no significant residual negative effects and that further undergrounding or compensation might be required. the PEIR states that significant landscape and visual impacts will occur along the length of the project. An approach to compensation is required. CCC have been calling for engagement on this issue since 2023. This matter is considered under discussion but likely to be considered not agreed leading into final review. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
3.8.9	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.	CCC consider the standard mitigation measures do not wholly mitigate substantial significant temporary impacts caused by construction.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and the **7.2 Outline Code of Construction Practice [REP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	This matter is considered under discussion and further review is to be undertaken by CCC CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
3.8.10	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 Statement Chapter 13 - Landscape and Visual [APP-226]**. Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project. The Applicant's position on landscape mitigation is also set out in **Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	CCC consider the additional mitigation measures do not address significant residual negative impacts from pylons and the overhead cables. We do not agree that the mitigation hierarchy has been effectively applied as it does not include compensation for the significant residual negative impacts of the overhead lines and pylons. An approach to compensation is required, where and how it will be identified and described, and how the applicant will engage on this topic with the local authority. We do not consider the applicants have considered or met either the EIA Regs or EN-1 requirements in relation to compensation. It appears the likely significant negative landscape and visual effects of the project are generally not to be compensated for which is not acceptable. CCC suggest the test of 'as far as possible' has not been met in any reasonable way in	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			relation to the likely significant permanent negative landscape and visual impacts along the length of the project described by the applicant within the PEIR. The planting has been identified as Landscape Compensation within 7.4 Landscape and Ecological Management Plan. Whilst the inclusion of this element of compensation within the LEMP is to be welcomed, it is not considered to be 'compensation' in Landscape and Visual Impact terms, judging it to be at best reinstatement for existing mature and semi-mature vegetation that is to be removed during construction. This matter is considered under discussion but likely to be considered not agreed leading into final review. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
EIA – Assessment of Likely Impacts and Effects				
3.8.11	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The assessment of effects during construction presented is considered appropriate.	The Statutory Consultation response for Chelmsford City Council (2024) identified: *The PEIR acknowledges that the proposals will have a significant negative landscape and visual impact at both construction and operational stages over the length of the*	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has responded to concerns raised regarding the extent of construction effects in Appendix H of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**.	*Project. This is identified as up to 1 Km from the Project line in many situations.* CCC generally accept the judgement that during the construction stage, significant effects occur generally within 1.5 Km of the Project. However, towards the end of the construction period it is considered that the adverse effects, especially visual, could extend beyond this distance, especially in open landscapes as multiple pylons and overhead line runs become visible. this matter is considered under discussion. Noted that to further discussions that tree and hedgerow removal needs to be quantified and provided. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
3.8.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is summarised in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	The Statutory Consultation response for Chelmsford City Council (2024) identified: The PEIR acknowledges that the proposals will have a significant negative landscape and visual impact at both construction and operational stages over the length of the Project. This is identified as up to 1 Km from the Project line in many situations. CCC's position is that at the operational stage impacts are likely to still be major	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			significant rather than moderate significant beyond 0.5Kms, particularly where there are multiple pylons 50m high visible in sequence couple with the overhead line and often in landscapes where invisibility is high. CCC consider that based on the information supplied, that significant negative impacts could occur at a distance greater than 1 Km from the Project, including on intangible landscape assets at the operational stage. Where negative effects are judged not to be significant the experience of receptors is still likely to be negatively affected over a wide area, reducing aesthetic enjoyment, the sense of place, history and identity, and inspiration for learning. In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding is required to protect valued local landscapes, long-distant rights of way and rural amenity sites. This matter is considered under discussion and requires further review. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions. REP3-075	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.8.13	Residual effects	The residual effects are presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** A further detailed response regarding visual receptor areas is provided in Table 4.20 of Section 4.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** With regard to LCA C5: Chelmer Valley: paragraph 13.3.707 of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** should state: '*The magnitude of the landscape change would be high within 0.5 km of the Order Limits, medium between 0.5 km and 1.5 km, and low elsewhere'* This will be addressed in the Errata.	LCA B1: Central Essex Farmlands: CCC generally agree with the judgements in Table A13.2.50 (construction and operational). LCA C5: Chelmer Valley: CCC agree that the judgements in Table A13.2.52 (construction and operational) are agreed with in regards to this LCA, yet query the magnitude at 0.5-1.5km (construction) which has been judged to be medium in the table but high in para 13.3.707. LCA D2: Brentwood Hills: CCC generally agree with the individual judgements made for within 0.5km, between 0.5-1.5 km and beyond 1.5 km, which confirm no reduction in effects from construction. LCA G2: Chelmsford and Environs: CCC agree with the judgements in Table A13.2.53 (construction and operational). **Visual receptor areas:** The following visual receptors were highlighted in the LIR: • F1 Great Leighs: • F2 Peverel's Farm • F5 Chignall Smealy • F4 Great Waltham • F5 Little Waltham • F6 Chelmsford North-West • F7 Roxwell • F8 Writtle and Chelmsford West	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			• F9 Edney Common • F10 Hylands Park • F11 Margaretting and Stock This matter is considered under discussion and requires further review. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
Specific Chelmsford related issues				
3.8.14	Great Waltham and Little Waltham	The residual landscape and visual effects in the vicinity of Great and Little Waltham are presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has also provided responses to the concerns raised, in the following documents: • Appendix H of 8.4.1 Applicant's Comments on Relevant Representations **[REP2-023]** • Section 3.7 of 8.8.2 Applicant's Comments on Local Impact Reports **[REP2-030].** • Table 4.20 of 8.8.2 Applicant's Comments on Local Impact Reports **[REP2-030].**	In landscape and visual impact terms, there are concerns regarding the wider impact of the pylons and overhead line on the historical landscape setting associated with Langleys. The introduction of pylons would likely degrade the setting by forming a backdrop of pylons behind the building within the wider landscape. There would be an introduction of overhead lines into a location where views are otherwise absent of industrialised features. There would be close and sometimes open views of the proposal from local receptors, from residential properties, PRoW and from scattered properties where pylons would appear very prominent. Pylons would appear stacked behind each other in some views.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			The scale of change would be large, and the effect would be major and significant (adverse), reducing to moderate and significant (adverse) within Little Waltham. The cumulative effect of multiple pylons and the continuous overhead linear nature of the project, means that the collective impacts would create an overall significant adverse effect at both construction and operation. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.15	Outline CoCP	**7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and is appropriate for managing construction impacts from the Project.	This matter is considered under discussion and requires further review of the Outline CoCP. CCC defers to ECC Place Services.	Under discussion
3.8.16	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and is appropriate. Comments received from EPS were considered.	This this matter is considered under discussion and requires further review of the Outline LEMP. CCC defers to ECC Place Services.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.8.17	Cumulative Impacts	The cumulative effects of the Project have been assessed and are presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. 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.	Likely Cumulative Landscape and Visual Impacts with VE, NFOW, EACN. CCC consider that the cumulative effect of multiple pylons and the continuous overhead linear character of the project, mean that the collective effects create an overall significant adverse effect within the VRA at both construction and operation. CCC defers to ECC Place Services. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion

3.9 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Chelmsford City 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 Socio-economics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and **6.15 Environmental**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.		
EIA – Approach and Methods				
3.9.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed.

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.		
3.9.4	Assessment methodology	An assessment on sports pitches and courts as recreational and tourism assets has been undertaken in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, Table 15.22 and Table 15.28, and **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**. The assessment of potential effects on Hylands House Country Estate is detailed in the **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**. The assessment concludes that a temporary, short-term, negligible and not significant residual effect is anticipated during construction, and a permanent, long-term, negligible and not significant residual effect is anticipated during operation (and maintenance). The potential effects on Essex International Jamboree during construction and operation has been assessed under the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, Table 15.22 and Table 15.28. The assessment concludes that a temporary, short-term, major adverse and significant residual effect is anticipated during construction, and a permanent, long-term, major	The Project should consider sports pitches and courts as well as Hylands Estate as recreation and tourism assets. The effect upon the Scout Jamboree site at Hylands Park should also be considered. Assessment upon the Hylands Estate is welcomed. There is a need to ensure effects are appropriately mitigated through Requirement. Assessment of Sports pitches and Courts is welcomed. There is no reference to the Scout Jamboree site and this should be included within the assessment. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 To keep the matter under discussion, CCC need to receive confirmation from the Scout Jamboree site / Writtle College that their concerns have been allayed. This could be through respective Statements of Common Ground. In the event that this is not possible, CCC proposes that the matter changes to Area of Concern, to highlight the matter to the ExA.	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		adverse and significant residual effect is anticipated during operation (and maintenance). The Applicant has responded specifically to concerns regarding the Essex International Scouts and Guides Jamboree in SET 1.14.2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant remains committed to continued engagement with the Essex International Scouts and Guides Jamboree with the aim of resolving outstanding matters where reasonably practicable and progressing the **8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078]** as discussions continue. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**. The key parameters and assumptions presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports REP2-030)**.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	During the construction of the development, community liaison would be critical to mitigate and address local concerns; with appropriate compensation paid to those whose concerns cannot be mitigated. The construction effects would be particularly noticeable around Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House. Detrimental effects on access to events and local businesses, however temporary, would be unacceptable. A Community Liaison Officer(S) should be appointed in common with other NSIPS's,	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		In relation to community liaison, **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. Additional mitigation measures are set out in **7.2 Outline Code of Construction Practice [REP4-164]**. No significant adverse residual effect has been identified on receptors located within Margaretting, including Hyland House, and Writtle.	with the role and appointment being secured by a requirement. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** and set out in the **7.2 Outline Code of Construction Practice [REP3-025]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In relation to community liaison, **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** confirms that a community relations	During the construction of the development, community liaison would be critical to mitigate and address local concerns; with appropriate compensation paid to those whose concerns cannot be mitigated. The construction effects would be particularly noticeable around Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House. Detrimental effects on access to events and local businesses, however temporary, would be unacceptable. A Community Liaison Officer(S) should be appointed in common with other NSIPS's, with the role and appointment being secured by a requirement. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		team will be appointed to engage with local residents and provide dedicated community relations and external communications support. Additional mitigation measures are set out in **7.2 Outline Code of Construction Practice [REP4-164]**. No significant adverse residual effect has been identified on receptors located within Margaretting, including Hyland House, and Writtle.		
3.9.9	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 Tourism [APP-265]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**) and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In relation to community liaison, **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. Additional mitigation measures are set out in **7.2 Outline Code of Construction Practice [REP4-164]**. No significant adverse residual effect	During the construction of the development, community liaison would be critical to mitigate and address local concerns; with appropriate compensation paid to those whose concerns cannot be mitigated. The construction effects would be particularly noticeable around Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House. Detrimental effects on access to events and local businesses, however temporary, would be unacceptable. A local skills and employment plan is absent from the projects. This should be secured to help maximise the benefits to the local economy and create localised training opportunities and jobs. Appropriate training should be provided to enable the local workforce to continue to fulfil future projects and provide operational support to the pylons and overhead lines should the DCO be granted. CCC is concerned about the inclusion of Sunday and Bank Holidays to the core	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		has been identified on receptors located within Margaretting, including Hyland House, and Writtle. The Applicant has provided a response to the Employment and Skills Plan in Section 3.16 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in response to question SET 1.15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [Revision A] into** the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. Section 3.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to DCO 1.S10 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** responds to concerns on the proposed construction working hours. The Applicant considers that the proposed approach presents a balance between providing the appropriate levels of flexibility to maintain programme whilst retaining safeguards through DCO controls to manage impacts included in **7.2 Outline Code of Construction Practice [REP4-164]**, including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).	working hours in relation to socio- economic industry and enjoyment of the countryside. The proposed working hours raise concern due to their extended nature, in particular at weekends and bank holidays where residents and users of the countryside would ordinarily expect respite from operations during the weekend. A Community Liaison Officer(S) should be appointed in common with other NSIPS's, with the role and appointment being secured by a requirement. CCC welcomes further clarification and consideration of the Employment and Skills Plan. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
EIA – Assessment of Likely Impacts and Effects				
3.9.10	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 Tourism [APP-265].** The assessment of effects during construction presented is considered appropriate. In relation to community liaison, **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. Additional mitigation measures are set out in **7.2 Outline Code of Construction Practice [REP4-164]**. No significant adverse residual effect has been identified on receptors located within Margaretting, including Hyland House, and Writtle. The Applicant has provided a response to the Employment and Skills Plan in Section 3.16 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in response to question SET 1.15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [Revision A] into** the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will	During the construction of the development, community liaison would be critical to mitigate and address local concerns; with appropriate compensation paid to those whose concerns cannot be mitigated. The construction effects would be particularly noticeable around Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House. Detrimental effects on access to events and local businesses, however temporary, would be unacceptable. A local skills and employment plan is absent from the projects. This should be secured to help maximise the benefits to the local economy and create localised training opportunities and jobs. Appropriate training should be provided to enable the local workforce to continue to fulfil future projects and provide operational support to the pylons and overhead lines should the DCO be granted. Regard would need to be had to the impact of the project upon recreation and tourism, through ensuing that Chelmsford's valued rural landscape remains open and accessible. CCC is concerned about the inclusion of Sunday and Bank Holidays to the core working hours in relation to socio- economic industry and enjoyment of the countryside.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		take to employment, skills, training and supply chain engagement during construction of the Project.	The proposed working hours raise concern due to their extended nature, in particular at weekends and bank holidays where residents and users of the countryside would ordinarily expect respite from operations during the weekend. A Community Liaison Officer(S) should be appointed in common with other NSIPS's, with the role and appointment being secured by a requirement. CCC welcomes further consideration of the Employment and Skills Plan. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-0153) and comments to the first Written Questions REP3-075 Although there are a number of matters that remain under discussion, overall CCC remain concerned that some of these matters have not / are not being resolved to CCC's satisfaction such as the hours of operation and their effects upon local businesses / residential amenity. It is unlikely that we will reach a mutually agreed position on all of these matters and whilst discussions will remain on going in respect of the Employment and Skills Plan and Community Liaison Officer for clarity, the matter is moved to not agreed.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.9.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265].** The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	Further consideration is needed regarding the Essex Scout Jamboree and Writtle College Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC is aware of wider concerns relating to the operation of the Scout Jamboree site / Writtle College and needs to receive confirmation that that their concerns have been allayed. This could be through respective Statements of Common Ground. In the event that this is not possible, CCC proposes that the matter changes to Area of Concern, to highlight the matter to the ExA.	Area of concern
3.9.12	Residual effects	The residual effects are presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265].** The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has provided a response to the Employment and Skills Plan in Section 3.16 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in response to question SET 1.15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [Revision A]** into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the	A local skills and employment plan is absent from the projects. This should be secured to help maximise the benefits to the local economy and create localised training opportunities and jobs. Appropriate training should be provided to enable the local workforce to continue to fulfil future projects and provide operational support to the pylons and overhead lines should the DCO be granted. CCC welcomes further consideration of the Skills and Employment Plan. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.		
Specific Chelmsford related issues				
3.9.13	Specific Chelmsford related issues	The potential effects on Essex International Jamboree during construction and operation has been assessed under the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, Table 15.22 and Table 15.28. The Applicant has responded specifically to concerns regarding the Essex International Scouts and Guides Jamboree in SET 1.14.2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant remains committed to continued engagement with the Essex International Scouts and Guides Jamboree with the aim of resolving outstanding matters where reasonably practicable and progressing the **8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078]** as discussions continue. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	CCC noted in their review of the Statement of Common Ground on 28 January 2026 to consider the Scout Jamboree Location CCC awaits conclusion of the Applicants discussions with Essex International Scouts and Guides Jamboree CCC is aware of discussions regarding the impact of the proposal upon the operation of the Cow Watering Campus at Writtle College. CCC awaits conclusion of these discussions. In the event that discussions cannot be concluded, CCC recommends that a requirement relating to the operation and use of the access through the College is submitted to and approved in writing by the LPA in consultation with the highway authority. These arrangements should be shared with ARU Writtle prior to submission of the requirement. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 CCC is aware of wider concerns relating to the operation of the Scout Jamboree site / Writtle College and needs to receive	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			confirmation that that their concerns have been allayed. This could be through respective Statements of Common Ground. In the event that this is not possible, CCC proposes that the matter changes to Area of Concern, to highlight the matter to the ExA.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.14	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 Tourism [APP-265]** and is appropriate for managing construction impacts from the Project. A number of meetings have been held with Chelmsford City Council regarding the structure and subsequent drafting of **7.2 Outline Code of Construction Practice [REP4-164]**. The latest version was updated and submitted at Deadline 3.	Under discussion. Further information and discussion is required on this matter, particularly in relation to Writtle College In the event that discussions can not be concluded CCC recommends that a requirement relating to the operation and use of the access through the College is submitted to and approved in writing by the LPA in consultation with the highway authority. These arrangements should be shared with ARU Writtle prior to submission of the requirement. See response to written questions REP3-075 CCC is needs to receive confirmation that that their concerns have been allayed. This could be through respective Statements of Common Ground. In the event that this is not possible, CCC proposes that the matter remains as Area of Concern, to highlight the matter to the ExA.	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.9.15	Public Rights of Way	**7.6 Outline Public Rights of Way Management Plan [APP-329]** has been submitted as part of the DCO application. It sets out the mitigation measures for PRoW and other recreational routes that fall within the Order Limit. In regard to Chelmsford, the affected ProW are proposed to be diverted or closure with managed access. Therefore, access to the ProW and recreational access to the countryside will be maintained during construction. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	There are several Public Rights of Way (ProW) within and abutting the Order Limits and CCC defers to Essex County Council ProW team regarding the impact of the proposal upon these. The ProW are an important feature in providing access and recreational opportunities within the countryside and contribute to the recreational and tourism value of the proposal. The ProW would need to remain open during the construction of the development to maintain recreational access to the countryside. CCC defers to ECC Highways. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under Discussion
3.9.16	Skills and Employment Plan and Skills Fund	The Applicant has provided a response to this matter in Section 3.16 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in response to question SET 1.15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [Revision A] into** the Examination at Deadline 5. This document is intended to provide transparency and clarity	The proposal would create temporary benefits on local employment generation and the local economy during the construction of the development. Yet a local skills and employment plan is absent from the proposals. This should be secured to help maximise the benefits to the local economy and create localised training opportunities and jobs. Appropriate training should be provided to enable the local workforce to continue to fulfil future projects and provide operational support to the pylons and overhead lines should the DCO be granted.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		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 considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	The Skills and Employment Plan should include: • 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. A Skills Fund, proportionate to the scale and impact of the development, should be prepared and used to: • Invest in local further education facilities and provision • Support employment and skills programmes • Enhance careers education and school engagement • Fund Officer resource for consultation and monitoring of the employment and skills strategy Please see CCC's full response set out in its Relevant Representations dated 27 November 2025 and CCC's final Local Impact Report. REP1-153 and response to written questions REP3-075. CCC welcomes the submission of and Employment and Skills Plan and awaits further details. Awaiting ECC advice	

3.10 Traffic and transport (including Public Rights of Way)

3.10.1 Chelmsford City Council defers its' position relating to traffic and transport, and public rights of way, to Essex County Council as the relevant highways authority. The following table outlines Chelmsford specific issues related to this topic.

Table 3.10 Matters Agreed, Not Agreed or Under discussion in relation to traffic and transport

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.10.1	Public Rights of Way (PRoW)	The overall PRoW strategy, as set out in the **7.6 Outline Public Rights of Way Management Plan [APP-329]**, is to maintain access along Public Rights of Way (PRoWs) at all times throughout the construction period, either through managed access along the PRoW on its existing alignment, or through provision of appropriate diversions. As such there are no PRoWs within Chelmsford that would be subject to closure without diversion and there would be no severance of the overall network as a result of the Project. Potential impacts on the local highway network have been assessed as part of 6.16 Environmental Statement Chapter 16 - Traffic and Transport **[APP-271]**, alongside junction modelling that was undertaken as part of **7.11 Transport Assessment [APP-333]** to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. The Applicant has also developed an **7.3 Outline Construction Traffic Management Plan [REP3-028],** the purpose of which is to monitor, mitigate and manage the impacts around construction traffic.	The main concern is the impact of the proposal upon the local highway network and Public Rights of Way (PRoW). It is understood the proposal would harmfully impact upon the local highway network and Public Rights of Way (PRoW). The effects would be particularly noticeable during the construction of the development and from the on-going maintenance and operation of the pylons, overhead lines and associated equipment. CCC defers to ECC highways authority on this matter. Upon receipt of ECC advice, the final position will be agreed. For now, it is listed as Under discussion.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Where required, suitable mitigation measures have been proposed or are under discussion with Essex County Council and National Highways to reduce the impact on journey times through junctions as presented within the **7.11 Transport Assessment [APP-333].** The Applicant has responded further to the impacts of construction on PRoWs in Section 4.14 Traffic and Transport of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in Section 14 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (see response to PRoW 1.3). The Applicant will continue to engage with Essex County Council as the relevant Local Highway Authority.		
3.10.2	A1060 Roxwell Road	**7.3 Outline Construction Traffic Management Plan [REP3-028]** details the monitoring and management principles for construction traffic. Within the monitoring principles is the development and provision of the driver information pack. The driver information pack will highlight areas of the network where pedestrians and cyclists may be using the network and other known potential hazard locations, e.g. where there are collision clusters along the highway network. Within the **7.11 Transport Assessment [APP-333]** it was found that the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51) recorded 10 collisions in the period between 2021–2023, which is comparable to the national average for Personal Injury Collisions p.a. per billion vehicle km.	It is noted that the A1060 Roxwell Road is the subject of a potential new road safety scheme involving average speed cameras. The scheme is being worked up as part of Essex County Council's Vision Zero approach to road safety with the aspiration of eliminating all road deaths and serious injuries in Essex by 2040. There are concerns that with the extra number of construction vehicles and large vehicle types using the link as part of the designated construction route that there will be an additional impact on safety. Further discussions are needed on areas of the network where accidents have been identified along the construction routes.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		7.3 Outline Construction Traffic Management Plan [REP3-028] highlights the existing absence of a footway or footpath on the A1060 Roxwell Road (Link PAR 51) to access the bus stop. The Project's embedded mitigation includes the driver information pack that will identify this location and other locations where pedestrians may be walking in the verge. Within **7.11 Transport Assessment [APP-333]** it is proposed to monitor the operation of the A1060 Roxwell Road / Lordship Road junction (site 69). Additional mitigation identified through 6.16 **Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has been highlighted for the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51), including the maintenance of adjacent vegetation to allow suitable visibility. Note also that the Applicant is having further discussions with ECC on road safety matters.	The construction of the development would give rise to a wide range of public health impacts, resulting in harm to the local communities that the proposal would sit. Matters including construction routes, hours of operation, the formation of vehicular accesses, traffic management and associated safety operations would need to be fully considered and mitigated as part of the proposals, with appropriate mitigation provided. CCC defers to ECC highways authority on this matter. Upon receipt of ECC advice, the final position will be agreed. For now, it is listed as Under discussion.	
3.10.3	Cumulative Impacts	The **7.3 Outline Construction Traffic Management Plan [REP3-028]** details the process the Applicant is committing to for engagement with other projects in the region. As part of the **7.11 Transport Assessment [APP-333]** junction modelling was undertaken to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. Where required, suitable mitigation measures have been proposed or are under discussion with Essex County Council and National Highways.	Cumulatively, the impacts of the proposal on all other existing NSIPS and strategic sites need to be considered with further consideration given to the following: • Essex residents and businesses; • Mitigation of traffic impacts at sensitive junction locations on the wider network; • Mitigation of construction routes on sensitive receptors; • Measures to reduce localised impacts associated with construction workers and construction traffic; • The design and monitoring of the traffic management in the relatively long-term situations.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] assessed the likely impact 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. The Applicant has developed the **7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311]** which includes potential measures which can be used to reduce the impact of the construction workforce from the Project on the highway network. The **7.3 Outline Construction Traffic Management Plan [REP3-028]** includes mitigation and monitoring measures for construction traffic. Note also that the Applicant is having further discussions with ECC as the Local Highway Authority.	CCC defers to ECC highways authority on this matter. Upon receipt of ECC advice, the final position will be agreed. For now, it is listed as Under discussion.	

3.11 Cumulative Effects

Table 3.11 Matters Agreed, Not Agreed or Under discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Chelmsford City 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 Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed
EIA – Approach and Methods				
3.11.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. Cumulative effects of the Project have been assessed and are presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment includes Longfield Solar Farm, Beaulieu Park and Lower Thames Crossing.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has been undertaking monthly reviews of local authority planning registers and is monitoring the Planning Inspectorate's National Infrastructure Project website for newly added nearby NSIPs. If changes to the conclusions of the inter-project cumulative effects assessment are identified as a result of additional applications and / or proposed allocations, these changes will be submitted into the examination. If further projects are added to the Applicant's inter-project cumulative effects assessment short list during the examination, the Applicant will update the **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** accordingly. The Applicant considers that through ongoing engagement between the parties, this matter was Agreed.		
3.11.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Sections 17.4 and 17. 5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]**. An assessment of Cumulative Effects that includes consideration of intra-project effects in regards to agriculture and soil, ecology and biodiversity, historic environment, traffic and transport, noise, and landscape and visual, has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion**	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. The effects raised regarding data sources from other ES topics will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		[APP-297] and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.11.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. The effects raised regarding assessment methodology from other ES topics will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075. There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.11.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The key parameters and assumptions presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. The effects raised regarding key parameters and assumptions will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion
EIA – Baseline Conditions				
3.11.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] to 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. The baseline conditions and receptors from other ES topics will be applicable here.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.11.7	Embedded mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] to 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. Embedded mitigation measures, designed as an inherent part of the Project are therefore set out in the environmental topic chapters of the Environmental Statement. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. The effects raised regarding embedded mitigation from other ES topics will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.11.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] to 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. Standard mitigation measures during construction are summarised in the environmental topic chapters **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] to 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** 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. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].**	The effects raised regarding standard mitigation from other ES topics will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion
3.11.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The effects raised regarding additional mitigation from other ES topics will be applicable here. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.	There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	
EIA – Assessment of Likely Impacts and Effects				
3.11.10	Construction effects – Intra-project cumulative effects	The assessment of effects during construction is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** The assessment of effects during construction presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and has provided a further response in Table 4.28 pages 811-815 of Section 4.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The cumulative effects assessment follows Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment' and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The Cumulative Effects chapter has assessed the potential intra-project cumulative effects and inter-project cumulative effects. Section 17.4 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** explains the approach to intra-project cumulative effects and the detailed assessment of intra-project cumulative	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		effects can be found in **6.17.A1 Appendix 17.1 – Intra-Project Cumulative Effects [APP-282]**. The assessment of clusters of other developments on common receptors can be found in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Details on ecology, archaeology, landscape and visual, noise, health and wellbeing and other matters raised by CCC are set out in the rows below. The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.		
3.11.10a	Construction effects – Ecology	An assessment of Cumulative Effects in respect to ecology has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** Further detail on the ecology and biodiversity intra-project cumulative effects can be found in **6.17.A1 Environmental Statement Appendix 17.1 - Intra-Project Cumulative Effects [APP-282]**.	**Ecology** It was determined that inter-project cumulative effects on ecology and biodiversity receptors within the areas surrounding the Project would be not significant during both construction and operation (and maintenance). This is either due to the distance of the project to other development, or due to a lack of notable ecological receptors/lack of connectivity for any protected species to reach the Project, or because of different habitats being affected within the Zone of Influence of other developments.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			It is considered that the embedded mitigation of the project route has very largely avoided a potential for significant impacts on any designated sites. The construction phase is expected to have primarily temporary impacts. After the construction of the pylons, overhead lines, and underground cable sections, those areas are anticipated to be restored back to similar, if not equivalent, natural habitats (although bearing in mind a currently limited habitat establishment commitment and on-going vegetation height management requirements). The operational stage of the project has very few and limited potential ecological impact pathways. The Norwich to Tilbury project as a whole has significant ecological impact potential owing to its scale – a 180km electricity transmission route plus compounds and construction infrastructure. However, where a lesser component section of the project may share a zone of influence with another development project, that section alone would be expected to have a much lower impact potential. CCC defers to ECC Place Services.	
3.11.10b	Construction effects – Landscape and Visual	An assessment of Cumulative Effects in respect to landscape and visual has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion**	**Landscape and Visual** A large number of significant Intra project landscape and visual effects associated with the Project have been identified, as reported	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		[APP-297] is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** Further detail on the landscape and visual intra-project cumulative effects can be found in **6.17.A1 Environmental Statement Appendix 17.1 - Intra-Project Cumulative Effects [APP-282]**.	in Chapter 13: Landscape and Visual (document reference 6.13). Based on the data available on the other developments, the assessment identified 47 shortlisted other development with the potential to contribute to significant inter-project effects on landscape and visual receptors during construction, and 34 during operation (and maintenance). These other developments have the potential to contribute to major and significant inter-project effects on Landscape Character Types (LCT) or Visual Receptors Areas (VRA). Despite this, para 17.5.58 states No additional mitigation measures beyond those proposed in Chapter 13: Landscape and Visual (Ref 6.13) have been identified'. Whilst it is agreed that it is not practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation should be secured to mitigate against this impact. The project would lead to a large number of significant landscape and visual effects during both construction and operation. Whilst it may not be practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation in the form of a funding package should be secured under a side agreement in partnership with the relevant authorities and environmental partners should be provided.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Significant cumulative effects at the construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (VRAs) and yet paragraph 17.4.21 identifies '… no additional mitigation measures were identified in addition to those already identified within the environmental topic assessments' (Our underlining). The decision-making assumptions that gave rise to these conclusions need clarifying. Paragraph 17.4.18 identifies that 'No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.' This is queried in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors. CCC defers to ECC Place Services.	
3.11.10c	Construction effects – Archaeology	An assessment of Cumulative Effects in respect to archaeology has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** The Applicant has provided a response to this matter in Table 4.28 pages 811-815 of **Section 4.15** of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	**Archaeology** There are a number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula, Thurrock and other Nationally Significant Infrastructure Projects (NSIPs) schemes dependant on Norwich to Tilbury) which have potential to have cumulative effects on archaeology due to the scale and nature of the development.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		Potential for intra-project cumulative effects was considered for all heritage assets, including archaeology, as set out in Table A17.1.1 of **6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282]**.	Cumulative effects of the development are split by the application into two categories: intra-project and inter-project. Archaeological remains are not considered potential receptors to give rise to intra-project cumulative effects. Inter-project cumulative effects are those which are resultant of the combination of the Norwich to Tilbury project and other existing projects. Effects to non-designated heritage assets/archaeological remains have been identified for the Project and separately for other developments and are listed in Table A17.3.1 in **Document 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP 284]**. No significant inter-project cumulative effects have been identified for archaeological remains as part of the assessment. The reasoning for this is expanded in Section 17.5.52 **[APP-281]** which states: "While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects would be mitigated as appropriate and agreed with the LPA (such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-project effects for	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			construction and operation (and maintenance) would be negligible and not significant." This statement is incorrect as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more projects and not from overlap. For example, in Tendring District a separate substation is planned to be erected adjacent to the substations required for both Five Estuaries and North Falls Offshore Windfarms and not within the same parcels of land. Similarly, the Lower Thames Crossing within Thurrock District will result in a significant impact on archaeological remains that would be increased by the groundworks required for the construction of a substation for Norwich to Tilbury as well as pylon bases and associated infrastructure. The cumulative impact of the project would be because of the increase in the total area of land take and not overlap, and therefore the scale of potential archaeological remains which could be lost as a result of the mitigation / construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an adverse effect of the project wherever they are removed. As the nature of the archaeological remains	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			that may be affected is currently unknown the impact and significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2004 Paragraph 218). CCC defers to ECC archeology	
3.11.10d	Construction Effects – Noise, Health and Wellbeing	An assessment of Cumulative Effects in respect to noise, health and wellbeing has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** details the assessment of the potential effects of the Project on Health and Wellbeing. The Applicant has undertaken extensive assessments to ensure the matters of construction routes, working hours, formation of vehicular accesses, traffic management and access for blue light vehicles are suitably considered. **7.3 Outline Construction Traffic Management Plan [REP3-028]** includes details of the proposed mitigations for these. The Applicant has provided a response to this matter in Table 4.28 ID 11.51-11.52 of Section 4.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	**Noise, Health and Wellbeing** CCC is particularly concerned regarding the cumulative noise and construction impacts arising from these developments. Cumulatively taken all together the project has potential to lead to significant adverse effects. It is crucial that residents get regular breaks, and the proposed development is well managed, controlled and integrated within existing permitted development schemes. Reasonable hours of work and good construction traffic management are one of the key measures to reduce impact. It is unlikely that CCC's concerns regarding hours of construction and effect on noise, health and well being will be mutually agreed and it is proposed that the matter is moved to not agreed.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.11.10e	Construction Effects – Other Impacts	An assessment of Cumulative Effects undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]** which includes an assessment with the Lower Thames Crossing project. No inter-project cumulative effects have been anticipated in relation to tourism assets during construction or operation. It is relevant to note the scale of employment associated with the Project, with a relatively small number of workers compared to other major construction projects. This factor, combined with the fact that construction activity moves along a linear route and the availability and distribution of accommodation across the Wider Study Area, explains why the effect on visitor accommodation bedspace during the construction period is considered to be negligible. The scale of employment is also important to note. **6.15 Environmental Statement Chapter 15 – Socio economics, Recreation and Tourism [APP-265]** (paragraph 15.7.13) states that the 'level of local employment, based on the assumption of approximately 4,800 construction jobs throughout the four-year construction period, could result in a total job demand of approximately 480 jobs locally'. These 480 jobs would be required within the four-year construction period, across the 180 km Project and 10 Local Planning Authority areas.	**Other Impacts** Cumulatively there is concern that should the DCO be granted, it would coincide with the construction of the Lower Thames Crossing. Although the anticipation is that there would be only 10% of local labour, there would be high demand across the area. Subject to season, those staying in local accommodation, could use vital bed space to which CCC is extremely short of. Cumulatively, the impacts of the project on all other existing NSIPS and strategic sites need to be considered with further consideration given to the following: • Essex residents and businesses; • Mitigation of traffic impacts at sensitive junction locations on the wider network; • Mitigation of construction routes on sensitive receptors; • Measures to reduce localised impacts associated with construction workers and construction traffic; • The design and monitoring of the traffic management in the relatively long-term situations. Further details of measures to reduce impacts and how these would work operationally are required. In the event that these discussions are not concluded, the matter is flagged as an Area of Concern.	Area of concern

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.11.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.5 of **Environmental Statement Chapter 17 - Cumulative Effects [APP-281] [APP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]**. The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and has provided a further response in Table 4.28 pages 811-815 of Section 4.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Please see rows 3.11.10 to 3.11.10e above.	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example.	Under discussion
3.11.11a	Operational (and maintenance) effects - Ecology	Please see rows 3.11.10 to 3.11.10e above.	**Ecology** it was determined that inter-project cumulative effects on ecology and biodiversity receptors within the areas surrounding the Project would be not significant during both construction and operation (and maintenance). This is either due to the distance of the project to other development, or due to a lack of notable ecological receptors/lack of connectivity for any protected species to reach the Project, or because of different habitats being affected within the Zone of Influence of other developments.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			It is considered that the embedded mitigation of the project route has very largely avoided a potential for significant impacts on any designated sites. The construction phase is expected to have primarily temporary impacts. After the construction of the pylons, overhead lines, and underground cable sections, those areas are anticipated to be restored back to similar, if not equivalent, natural habitats (although bearing in mind a currently limited habitat establishment commitment and on-going vegetation height management requirements). The operational stage of the project has very few and limited potential ecological impact pathways. The Norwich to Tilbury project as a whole has significant ecological impact potential owing to its scale – a 180km electricity transmission route plus compounds and construction infrastructure. However, where a lesser component section of the project may share a zone of influence with another development project, that section alone would be expected to have a much lower impact potential. CCC defers to ECC Place Services.	
3.11.11b	Operational (and maintenance) effects – Landscape and Visual	Please see rows 3.11.10 to 3.11.10e above.	**Landscape and Visual** A large number of significant Intra project landscape and visual effects associated with the Project have been identified, as reported in Chapter 13: Landscape and Visual	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			(document reference 6.13). Based on the data available on the other developments, the assessment identified 47 shortlisted other development with the potential to contribute to significant inter-project effects on landscape and visual receptors during construction, and 34 during operation (and maintenance). These other developments have the potential to contribute to major and significant inter-project effects on Landscape Character Types (LCT) or Visual Receptors Areas (VRA). Despite this, para 17.5.58 states 'No additional mitigation measures beyond those proposed in Chapter 13: Landscape and Visual (Ref 6.13) have been identified'. Whilst it is agreed that it is not practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation should be secured to mitigate against this impact. The project would lead to a large number of significant landscape and visual effects during both construction and operation. Whilst it may not be practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation in the form of a funding package should be secured under a side agreement in partnership with the relevant authorities and environmental partners should be provided.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Significant cumulative effects at the construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (VRAs) and yet paragraph 17.4.21 identifies '… no additional mitigation measures were identified in addition to those already identified within the environmental topic assessments' (Our underlining). The decision-making assumptions that gave rise to these conclusions need clarifying. Paragraph 17.4.18 identifies that 'No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.' This is queried in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors. CCC defers to ECC Place Services.	
3.11.11c	Operational (and maintenance) effects - Archaeology	Please see rows 3.11.10 to 3.11.10e above.	**Archaeology** There are a number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula, Thurrock and other Nationally Significant Infrastructure Projects (NSIPs) schemes dependant on Norwich to Tilbury) which have potential to have cumulative effects on archaeology due to the scale and nature of the development.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Cumulative effects of the development are split by the application into two categories: intra-project and inter-project. Archaeological remains are not considered potential receptors to give rise to intra-project cumulative effects. Inter-project cumulative effects are those which are resultant of the combination of the Norwich to Tilbury project and other existing projects. Effects to non-designated heritage assets/archaeological remains have been identified for the Project and separately for other developments and are listed in Table A17.3.1 in Document **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP 284]**. No significant inter-project cumulative effects have been identified for archaeological remains as part of the assessment. The reasoning for this is expanded in Section 17.5.52 **[APP-281]** which states: "While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects would be mitigated as appropriate and agreed with the LPA (such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-project effects for	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			construction and operation (and maintenance) would be negligible and not significant." This statement is incorrect as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more projects and not from overlap. For example, in Tendring District a separate substation is planned to be erected adjacent to the substations required for both Five Estuaries and North Falls Offshore Windfarms and not within the same parcels of land. Similarly, the Lower Thames Crossing within Thurrock District will result in a significant impact on archaeological remains that would be increased by the groundworks required for the construction of a substation for Norwich to Tilbury as well as pylon bases and associated infrastructure. The cumulative impact of the project would be because of the increase in the total area of land take and not overlap, and therefore the scale of potential archaeological remains which could be lost as a result of the mitigation / construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an adverse effect of the project wherever they are removed. As the nature of the archaeological remains	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			that may be affected is currently unknown the impact and significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2004 Paragraph 218). CCC defers to ECC Archaeology.	
3.11.11d	Operational (and maintenance) effects – Health and Wellbeing	Please see rows 3.11.10 to 3.11.10e above.	**Noise, Health and Wellbeing** CCC is particularly concerned regarding the cumulative noise and construction impacts arising from these developments. Cumulatively taken all together the project has potential to lead to significant adverse effects. It is crucial that residents get regular breaks, and the proposed development is well managed, controlled and integrated within existing permitted development schemes. Reasonable hours of work and good construction traffic management are one of the key measures to reduce impact. It is unlikely that CCC's concerns regarding hours of construction and effect on noise, health and well being will be mutually agreed and it is proposed that the matter is moved to not agreed.	Not agreed
3.11.11e	Operational (and maintenance) effects – Other Impacts	Please see rows 3.11.10 to 3.11.10e above.	**Other Impacts** Cumulatively there is concern that should the DCO be granted, it would coincide with the construction of the Lower Thames	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Crossing. Although the anticipation is that there would be only 10% of local labour, there would be high demand across the area. Subject to season, those staying in local accommodation, could use vital bed space to which CCC is extremely short of. Cumulatively, the impacts of the project on all other existing NSIPS and strategic sites need to be considered with further consideration given to the following: • Essex residents and businesses; • Mitigation of traffic impacts at sensitive junction locations on the wider network; • Mitigation of construction routes on sensitive receptors; • Measures to reduce localised impacts associated with construction workers and construction traffic; • The design and monitoring of the traffic management in the relatively long-term situations. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 In the event that these discussions are not concluded, the matter is flagged as an Area of Concern.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.11.12	Residual effects	The residual effects are presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]**. The summary of residual effects arising as a result of the Project is considered appropriate. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and has provided a further response in Table 4.28 pages 811-815 of Section 4.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Please see rows 3.11.10 to 3.11.10e.	The project has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise for example. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Under discussion
3.11.12a	Residual Effects - Ecology	Please see rows 3.11.10 to 3.11.10e above.	**Ecology** it was determined that inter-project cumulative effects on ecology and biodiversity receptors within the areas surrounding the Project would be not significant during both construction and operation (and maintenance). This is either due to the distance of the project to other development, or due to a lack of notable ecological receptors/lack of connectivity for any protected species to reach the Project, or because of different habitats being affected within the Zone of Influence of other developments. It is considered that the embedded mitigation of the project route has very	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			largely avoided a potential for significant impacts on any designated sites. The construction phase is expected to have primarily temporary impacts. After the construction of the pylons, overhead lines, and underground cable sections, those areas are anticipated to be restored back to similar, if not equivalent, natural habitats (although bearing in mind a currently limited habitat establishment commitment and on-going vegetation height management requirements). The operational stage of the project has very few and limited potential ecological impact pathways. The Norwich to Tilbury project as a whole has significant ecological impact potential owing to its scale – a 180km electricity transmission route plus compounds and construction infrastructure. However, where a lesser component section of the project may share a zone of influence with another development project, that section alone would be expected to have a much lower impact potential. CCC defers to ECC Place Services.	
3.11.12b	Residual Effects – Landscape and Visual	Please see rows 3.11.10 to 3.11.10e above.	**Landscape and Visual** A large number of significant Intra project landscape and visual effects associated with the Project have been identified, as reported in Chapter 13: Landscape and Visual (document reference 6.13). Based on the	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			data available on the other developments, the assessment identified 47 shortlisted other development with the potential to contribute to significant inter-project effects on landscape and visual receptors during construction, and 34 during operation (and maintenance). These other developments have the potential to contribute to major and significant inter-project effects on Landscape Character Types (LCT) or Visual Receptors Areas (VRA). Despite this, para 17.5.58 states 'No additional mitigation measures beyond those proposed in Chapter 13: Landscape and Visual (Ref 6.13) have been identified'. Whilst it is agreed that it is not practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation should be secured to mitigate against this impact. The project would lead to a large number of significant landscape and visual effects during both construction and operation. Whilst it may not be practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation in the form of a funding package should be secured under a side agreement in partnership with the relevant authorities and environmental partners should be provided.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Significant cumulative effects at the construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (VRAs) and yet paragraph 17.4.21 identifies '… no additional mitigation measures were identified in addition to those already identified within the environmental topic assessments' (Our underlining). The decision-making assumptions that gave rise to these conclusions need clarifying. Paragraph 17.4.18 identifies that 'No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.' This is queried in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors. CCC defers to ECC Place Services.	
3.11.12c	Residual Effects - Archaeology	Please see rows 3.11.10 to 3.11.10e above.	**Archaeology** There are a number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula, Thurrock and other Nationally Significant Infrastructure Projects (NSIPs) schemes dependant on Norwich to Tilbury) which have potential to have cumulative effects on archaeology due to the scale and nature of the development.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Cumulative effects of the development are split by the application into two categories: intra-project and inter-project. Archaeological remains are not considered potential receptors to give rise to intra-project cumulative effects. Inter-project cumulative effects are those which are resultant of the combination of the Norwich to Tilbury project and other existing projects. Effects to non-designated heritage assets/archaeological remains have been identified for the Project and separately for other developments and are listed in Table A17.3.1 in Document **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP 284]**. No significant inter-project cumulative effects have been identified for archaeological remains as part of the assessment. The reasoning for this is expanded in Section 17.5.52 **[APP-281]** which states: "While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects would be mitigated as appropriate and agreed with the LPA (such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-project effects for	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			construction and operation (and maintenance) would be negligible and not significant." This statement is incorrect as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more projects and not from overlap. For example, in Tendring District a separate substation is planned to be erected adjacent to the substations required for both Five Estuaries and North Falls Offshore Windfarms and not within the same parcels of land. Similarly, the Lower Thames Crossing within Thurrock District will result in a significant impact on archaeological remains that would be increased by the groundworks required for the construction of a substation for Norwich to Tilbury as well as pylon bases and associated infrastructure. The cumulative impact of the project would be because of the increase in the total area of land take and not overlap, and therefore the scale of potential archaeological remains which could be lost as a result of the mitigation / construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an adverse effect of the project wherever they are removed. As the nature of the archaeological remains	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			that may be affected is currently unknown the impact and significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2004 Paragraph 218). CCC defers to ECC Archaeology	
3.11.12d	Residual Effects – Health and Wellbeing	Please see rows 3.11.10 to 3.11.10e above.	**Noise, Health and Wellbeing** CCC is particularly concerned regarding the cumulative noise and construction impacts arising from these developments. Cumulatively taken all together the project has potential to lead to significant adverse effects. It is crucial that residents get regular breaks, and the proposed development is well managed, controlled and integrated within existing permitted development schemes. Reasonable hours of work and good construction traffic management are one of the key measures to reduce impact	Under discussion
3.11.12e	Residual Effects – Other Impacts	Please see rows 3.11.10 to 3.11.10e above.	**Other Impacts** Cumulatively there is concern that should the DCO be granted, it would coincide with the construction of the Lower Thames Crossing. Although the anticipation is that there would be only 10% of local labour, there would be high demand across the area. Subject to season, those staying in	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			local accommodation, could use vital bed space to which CCC is extremely short of. Cumulatively, the impacts of the project on all other existing NSIPS and strategic sites need to be considered with further consideration given to the following: Essex residents and businesses; • Mitigation of traffic impacts at sensitive junction locations on the wider network; • Mitigation of construction routes on sensitive receptors; • Measures to reduce localised impacts associated with construction workers and construction traffic; • The design and monitoring of the traffic management in the relatively long-term situations. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 In the event that these discussions are not concluded, the matter is flagged as an Area of Concern.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Specific Chelmsford related issues				
3.11.13	Specific Chelmsford related issues	The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and has provided a further response in Table 4.28 pages 811-815 of Section 4.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.11.14	Outline CoCP	**7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and is appropriate for managing construction impacts from the Project.	Under discussion. There are a range of concerns or comments, some of which are agreed others disagreed. It is recommended the matter stays under discussion to reflect the fluidness of these concerns.	Under discussion
Other matters as required				

3.12 Development Consent Order

3.12.1 With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the **3.1 Draft Development Consent Order [REP4-037]**.

Table 3.12 Matters Agreed, Not Agreed or Under discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.12.1	DCO Requirements – Additional requirements	The **3.1 Draft Development Consent Order [REP4-037]** is drafted on the basis that the overhead line can be aligned within the horizontal limits of deviation shown on the **2.3 Works Plans [APP-017 to APP-024]**. The vertical limits of deviation are described in Article 5 of the **3.1 Draft Development Consent Order [REP4-037]** and the table of parameters at the back of the Works Plans. The proposals in respect of the Walthams are a direct response to stakeholder consultation and have been assessed within the Environmental Impact Assessment. As such, no further approval or notification for heights or alignments which are within the Limits of Deviation and the specified parameters is justified. The Applicant has responded further on this point in Table 3.21, page 144 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant will continue to engage with CCC on this matter.	CCC understands that full height pylons are proposed between TB140 – 142. Whilst this is welcomed in principle, the proposal and details should be publicised. The following requirement wording is suggested Great Waltham and Little Waltham – Pylons TB140 – 142 (inclusive) 1) No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of— (a) the layout; (b) scale (including height); (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; (f) Consultation Report advising of the change to the pylon height and (i) programme for landscaping works, relating to Pylons TB140 – TB142	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			(inclusive) have been submitted and approved by the relevant planning authority for that phase. 2) The details submitted must accord with the outline design principles 3) The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. 4) For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal. Please see comments to the first Written Questions REP3-075	
3.12.2	DCO Requirements – Additional requirements	The Limits of Deviation are clearly described and shown in the application documents and have been assessed within the Environmental Impact Assessment. As such, no further approval or notification for heights or alignments which are within the Limits of Deviation and the specified parameters is justified. The Applicant has responded further on this point in Table 3.21, page 144 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	A Requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors. It would be prudent, prior to submission that affected receptors within 200 metres of the pylon are notified in writing of such change and a site notice is displayed. Occupants should be asked to comment on the movement of such pylon and given 21 days to respond.	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			The following wording is proposed: 1) Where a pylon is proposed to be resited within the Limits of Deviation, no phase of the construction works to such pylon may commence until details of— (a) the layout; (b) scale (including height); (c) proposed finished ground levels; (d) external appearance; (e) consultation report containing details of occupants notified and a list of site notices and locations display and (i) programme for landscaping works, relating to that pylon have been submitted and approved by the relevant planning authority for that phase. 2) The details submitted must accord with the outline design principles 3) The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. 4) For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal. Please see comments to the first Written Questions REP3-075	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.12.3	DCO Requirements – Additional requirements	The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by the Applicant to the local planning authorities along the Project route under s.106 of the Town and Country Planning Act 1990, relating to obligations designed to secure at least a 10% biodiversity net gain as part of the Project. As the Applicant intends to secure the BNG commitment via a unilateral undertaking, it is not considered a further commitment within the draft DCO is necessary. Please refer to the Applicant's response to DCO 1.S15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	A post-consent programme of ecological mitigation measures and a BNG delivery plan will both need to be secured through DCO Requirements. CCC defers to ECC Place Services	Not agreed
3.12.4	DCO Requirements – Archaeology	Requirement 5 within the **3.1 Draft Development Consent Order [REP4-037]** already includes provision for evaluation. The post-consent process and techniques in the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** includes evaluation and this document is secured through Requirement 5. 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 Questions [REP3-074]**. The Applicant has submitted **8.9.1 Applicant's Response to First Written Questions – Corrected Response to Question DCO 1.S8 [AS-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 is currently considering the responses received and will provide an update at Deadline 6.	Schedule 3 (Requirements) Archaeology Archaeological mitigation measures are secured through proposed requirement 5 in the Draft DCO. Should the Project be granted based on the current levels of evaluation, any requirement should explicitly allow for a separate evaluation stage of archaeological work, before securing a detailed investigation stage as mitigation. The Requirement wording for Archaeology (Requirement 5) (APP-056) does not currently take into account the post-consent programme of archaeological trenching required, or secure timescales for delivery of the Post-Excavation Assessments. CCC defers to ECC archaeology	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.12.5	DCO Requirements – Wording for archaeology	**7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-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, 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 Investigation [APP-328]** are secured by Requirement 5 of **3.1 Draft Development Consent Order [REP4-037]**. 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	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 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	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has submitted **8.9.1 Applicant's Response to First Written Questions – Corrected Response to Question DCO 1.S8 [AS-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 is currently considering the responses received and will provide an update at Deadline 6.	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 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. CCC defers to ECC archaeology	
3.12.6	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 Questions [REP3-074]**. Requirement 7 (Construction Hours) of the **3.1 Draft Development Consent Order [REP4-037]** provides that the proposed core working hours are 07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and other Public Holidays, unless alternative hours are approved by the relevant planning authority. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of	In relation to construction hours, CCC propose the following requirement, "No construction works shall take place except between the following hours: 07;00 to 19:00 Monday to Friday, and 08:00 to 13:00 Saturday. No construction works shall take place at any time on Sunday or a Bank Holiday." CCC maintains its view that there should be no working on Sundays and Bank Holidays. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The construction working hours set out in **3.1 Draft Development Consent Order [REP4-037]** define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in **7.2 Outline Code of Construction Practice [REP4-164].** The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining		

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays / bank holidays would materially harm the deliverability of this critical national priority project. 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.		
3.12.7	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 delayed by means outside the control of National Grid. The Applicant's position remains that extending the decision-making period beyond what it proposes	CCC is particularly keen to ensure that the proposed 'requirements' are both workable, achievable and deliverable. The N2T DCO as drafted only allows for 28 days for a decision to be made on a submitted requirement. The explanatory memorandum explains that the 28-day period is appropriate for a Project of this scale and size to ensure the timely delivery of the Project. This is not acceptable to CCC. A 28 day period is insufficient to assess complex technical matters and cross boundary issues. There are limited numbers of officers with detailed knowledge of the Project, and the cumulative effect of staff leave would render this timeframe even less achievable. The risk of deemed consent after 28 days could result in Requirements being refused or approved without sufficient time to fully assess or resolve outstanding issues.	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		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 Development Consent Order 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. Please refer to the Applicant's response to DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. 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.	Timeframes set out in the DCO must be sufficient for CCC to consider, engage with stakeholders and respond to such applications submitted to it, as well as affording Applicants time to feedback and respond to any further comments made. CCC consider that a minimum of 56 days is given to determine the Requirement. As stated in CCC's response to written questions REP3 – 075 CCC is a Discharging Authority on the Longfield Solar Farm DCO EN010118, which has a discharging timeframe of 10 weeks. CCC is aware that Suffolk County Council have produced a response to this question and defers to their response. Their response indicates that a timeframe of 56 days is necessary. In CCC's experience as a Discharging Authority for Longfield Solar Farm DCO, the areas that take time to process a Requirement include the following: • Requirement validation • Requirement consultation (21 days) • Report writing and consideration of consultation comments. • Reconsultation. CCC reiterates that the need for reasonable timeframes is not about delaying the Project. It about making sure	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			that CCC has sufficient time to undertake all of the necessary processes and statutory functions. CCC has a good working relationship on Longfield Solar Farm and is happy to provide further examples and best practice on this where required. From experience, complicated technical discharges relating to numerous plans and documents, requiring considerable consultee input, Officer assessment and administration support take time. There is no mechanism for reconsultation within the current NSIP requirement discharge process and CCC is dependent upon the Applicant as to whether they will allow it or not. Should an Applicant refuse re-consultation, the remaining options are to refuse or withdraw the Requirement resulting in untimely delay and further administration. Where additional information is needed, the Applicant needs time to prepare the submission, then CCC needs to receive it, reconsult and await the consultation comments. This takes time and can impact upon the consideration of the requirement. CCC would prefer to be given appropriate and reasonable time to deal with the requirements, without asking	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			for additional extensions of time requiring further administration. Should this DCO be granted, it is critical that CCC has the appropriate means and time to do so. CCC considers that the proposed timeframe of 35 days is still insufficient to enable discharge of the requirements.	
3.12.8	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 Development Consent Order [REP4-037]** to replace the five-day period for the request of further information to five 'business days'. Paragraph 2(4) of Schedule 4 allows the relevant authority to seek the Applicant's consent to request further information after the five business day period if 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.	CCC considers that a longer period is required (a minimum of 15 business days) to enable consultees to determine whether further information is required in common with Longfield Solar Farm DCO. Where the Council, as discharging authority, is required to consult third parties, an amendment should be made to require the Applicant to serve the relevant documentation on the relevant Requirement consultee at the same time as serving it on the Council. This approach is adopted to some extent within the Longfield Solar Farm DCO and enables more efficient use of time. CCC considers that a five business day timeframe is not proportionate or appropriate. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
3.12.9	DCO Requirements - Fees	The Applicant has updated the proposed fee to align with the current national guidance in **3.1 Draft Development Consent Order [REP3-004]**. The Applicant proposes this matter is moved to Agreed.	The fee needs to be updated in line with latest planning fee guidance. Noted. Provision should be made to account for yearly fee rises in accordance with standard discharging procedures. The matter will be moved to Agreed, upon confirmation of payment of yearly fee rises.	Under discussion
3.12.10	DCO Requirements – Additional requirements	The programme of ecological mitigation is set out within **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** and commitment GG04 in **7.2 Outline Code of Construction Practice [REP4-164]** secures an ECoW who will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required good practice and standard mitigation measures. The outline management plans are secured by Requirement 4 (Construction management plans) of **3.1 Draft Development Consent Order [REP4-037]**. The Applicant's response to DCO 1.S15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** explains why a specific reference to securing BNG is not contained in the dDCO.	A post-consent programme of ecological mitigation measures and a BNG delivery plan will both need to be secured through DCO Requirements. The strength of the DCO Requirements in ensuring the delivery of the mitigation measures and BNG plan will be critical to determining what ecological impact the Norwich to Tilbury project ultimately renders (positive or negative) for Essex local authority districts. CCC defers to ECC Place Services	Under discussion
Other matters as required				

3.13 Other Matters

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

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.13.1	Agriculture and Soils	The Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource and on agricultural activities (as set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**). For the Applicant's position on agriculture and soils please refer to Section 4.4 Land Use (Agriculture and Soils) in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the response to LUS 1.9 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	CCC's main concern is the loss of Best and Most Versatile agricultural land and disruption of agricultural activities as a consequence of the loss of agricultural land. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075 It is unlikely that all of CCC's concerns will be mutually agreed and it is proposed that the matter is moved to not agreed.	Not agreed

3.14 Mitigation and Compensation

Table 3.14 Matters Agreed, Not Agreed or Under Discussion in relation to Other Matters

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
Other matters as required				
3.14.1	Mitigation and Compensation	**8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** includes the Applicant's position on a number of matters relating to mitigation and compensation, including:	The project would have clear and extensive residual impacts arising that would adversely affect the local economy and environment, as well as the health and	Under discussion

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		• Section 3.10, Landscape and Visual – Landscape Compensation • Section 3.12, Biodiversity, Ecology and Nature Conservation – Replacement Tree Planting • Section 3.12, Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain • Section 3.15, Socio-economics, Recreation and Tourism – Community Benefits • Section 3.15, Socio-economics, Recreation and Tourism – Employment, Skills, Training and Local Supply Chain The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [Revision A]** into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that 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. With regards to community benefit funding, the Applicant is considering how the funding should be used and notes the suggestions made in the Local Impact Reports. Further details are provided in Section 3.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant welcomes ongoing engagement with CCC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.	wellbeing of communities in Chelmsford. These impacts cannot be sufficiently mitigated or compensated through the planning regime. CCC contends that while the Norwich to Tilbury Project will deliver significant benefits at a national level, this will not offset the harm at the local level. This is unacceptable to CCC and CCC objects to the lack of appropriate mitigation and compensation. CCC recognise the timing for the project is driven by the need for capacity in the transmission system by 2030. Yet it is CCC's view that such benefit should not and cannot be secured at the expense of Chelmsford's local communities, landscapes and environments that would be affected by the proposal The proposal would introduce vast incongruous features of industrial character into a rural landscape, which would have harmfully impact upon the landscape, historic environment and amenities of the communities within which they would sit. The pylons and overhead lines would be visually noticeable and prominent. Many of the effects cannot be mitigated against due to the height and scale of the proposal and would be permanent. CCC consider that reasonable compensation and benefits to the wider area including a, Skills and Employment funds, environmental and landscape enhancement and funding for heritage.	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			Although separate to planning, affected residents should be appropriately compensate and a Community Benefit fund introduced Whilst CCC welcomes and Employment and Skills Plan, details of the content of this are required. Matters relating to other forms of compensation including those relating to heritage, landscape and trees remain outstanding. Separately to planning, CCC notes the need for residential compensation. Please see CCC's Relevant Representations dated 27 November 2025 final Local Impact Report (REP1-153) and comments to the first Written Questions REP3-075	

4. Confirmation of Agreement

Both parties agree that this SoCG is a draft document and as such has not been signed the parties. The final version of the SoCG will be signed by both parties in due course upon agreement.

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

Signed for and on behalf of National Grid:

……

Date:

……

Signed for and on behalf of Chelmsford City Council:

……

Date:

……

Appendix A
Draft DCO wording

Table A.1 Comments on draft DCO

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
1.	DCO Wording - consultation	The Applicant shared a pre-submission version of the **3.1 Draft Development Consent Order** with the lead case officers of all host authorities on 3 June 2025 and had regard to all feedback received prior to submission of the application. The Applicant continues to have regard to, and has responded to, comments raised by Chelmsford City Council during the examination period.	Applicants are encouraged to engage in discussions on draft documents ahead of submission, to resolve matters where possible. CCC recognises in line with Nationally Significant Infrastructure Projects: Advice for Local Authorities as published by Planning Inspectorate on 8 August 2024, (updated 16 December 2024), there is a responsibility on the local authority to "Consider the Applicant's draft Development Consent Order (DCO), including requirements". Despite repeated attempts to engage with NGET regarding the content and form of the draft DCO, regrettably the details of the draft Development Consent Order were not shared with CCC in advance of the submission. NGET offered CCC an opportunity to review some elements of the draft DCO ahead of submission, albeit noting that there were some omissions). CCC, working with Essex County Council (ECC), provided comments to the Applicant detailing a number of concerns. However, no feedback was offered by the Applicant on the comments provided. It appears from the Development Consent Order as submitted (APP-056) that many of the	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			comments provided have not been taken into account, and no explanation has been offered. While CCC will continue to engage with the Applicant regarding the dDCO, there continue to be a number of issues which require resolution before any order can be made. (Paras 10.1-10.4)	
2.	DCO Wording – Control documents	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [REP4-170]** are provided as appendices of **7.2 Outline Code of Construction Practice [REP4-164**. 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 Order [Revision E]**.	Article 2 "Control Documents" The N2T DCO includes an "outline code of construction practice" but does not include a Construction Environmental Management Plan, Materials and Waste Management Plan. Clarity is required as to which documents will cover the scope of these matters, given their importance in managing the delivery phase of the scheme. (Para 10.5) CCC requests the provision of a separate CEMP in line with general practice.	Not agreed
3.	DCO Wording – Limits of Deviation	Six metres is the same upward deviation as was allowed for in The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and is intended to provide a necessary but proportionate degree of flexibility in the construction of the authorised development and to reduce risk. It allows the addition of two standard pylon sections, each measuring three metres in height. The limits of deviation have been assessed in the Environmental Statement	Article 5 – Limits of Deviation The Limits of Deviation (LoD) are set out on page 10 of the N2T DCO. These allow for longitudinal and lateral deviation (unrestricted) within the Order Limits, as well as vertical deviation. The N2T DCO proposes a vertical deviation of 6m. The explanatory memorandum sets out why flexibility across the scheme in its entirety is necessary to avoid the risk of the	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		submitted with the application for development consent **[APP-123 to APP-298]** and no re-assessment is required. The **3.1 Draft Development Consent Order [Revision E]** is drafted on the basis that the overhead line can be aligned within the horizontal limits of deviation shown on the **2.3 Works Plans [APP-017 to APP-024]**. The vertical limits of deviation are described in Article 5 of the **3.1 Draft Development Consent Order [Revision E]** and the table of parameters at the back of the Works Plans. The proposals in respect of the Walthams are a direct response to stakeholder consultation and have been assessed within the Environmental Impact Assessment. As such, no further approval or notification for heights or alignments which are within the Limits of Deviation and the specified parameters is justified.	scheme becoming incapable of implementation due to unforeseen ground conditions or engineering considerations. This is accepted in principle by the CCC. Yet the LoD have potentially significant implications for landscape and visual impacts, heritage impacts and noise, as discussed in the relevant chapters of this LIR. CCC consider that a virtual deviation of 6m is too high and unjustified. This should be amended to a maximum of 4m high, to minimise environmental impacts. In Great Waltham and Little Waltham, the Limits of Deviation make provision to increase the height of the lower height pylons TB140 – TB142 to full height pylons. The requirement, as currently worded, enables alteration to the height of these pylons, but is silent on the horizontal limits of deviation which are referred to in the works plans. Should this change be implemented, and full height pylons installed post consent, the requirement as it stands makes no reference to publicise the alteration and inform the Local Planning Authority and the host communities of the change. An additional requirement or appropriate mechanism should be provided to enable consultation and notification of any alteration to the height and location of the lower height pylons. The Limits of Deviation enable the movement of pylons along the Overhead Line without consultation. This is unacceptable as the movement could lead to increased and	

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
			unacceptable harm. Affected receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm. (Para 10.6-10.9) Please see CCC's comments to the first Written Questions.	
4.	DCO Wording – Definition of "Maintain"	The Applicant's position remains that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant, noting that a failure of the Applicant to comply with a term of the DCO would be an offence that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008.	Whilst the Applicants statutory duties are acknowledged, it is a matter of opinion whether the activities would give rise to materially new or materially different effects, and it is important that those effects are assessed appropriately. The introduction of the Local Planning Authority safeguard is considered to present the best possible means of assessing these impacts, and the Applicant, through its considerable and extensive experience planning and programming of maintenance schedules, should be able to timetable in Local Planning Authority involvement as required.	Not agreed
5.	DCO Wording – definition of "relevant planning authority"	The Applicant welcomes the Council's agreement to its revised drafting.	CCC has no objections to the revised wording relating to Local Government reform. Similar wording exists within other DCO's such as Longfield, which enable continuity planning.	Agreed
6.	DCO Wording – Trees subject to TPOs	Article 51 (Trees subject to Tree Preservation Orders) within **3.1 Draft Development Consent Order [Revision E]**, together with **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**, set out controls on the Applicant's powers to fell and lop trees	Article 51 – Trees subject to Tree Preservation Orders (TPO) Due to the special importance of trees subject to TPO's, a definition of "near" is required for the avoidance of doubt. Additional wording should be added to the effect that advance	Not agreed

ID	Matter	National Grid's Position	Chelmsford City Council's Position	Status
		protected by TPOs, both within and outside the Order Limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. The use of 'near' is to mirror the wording used in Article 50 (Felling and lopping of trees, etc). A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. Additionally, Article 51(3) of **3.1 Draft Development Consent Order [Revision E]** places a statutory duty on the Applicant not to cause any unnecessary damage to any tree when exercising its powers under this article, a breach of which would be an offence. The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within **3.1 Draft Development Consent Order [Revision E]** and to ensure that the delivery of the Project, which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.	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). (Para 10.10)	

Appendix B
Engagement history

Table B.1 Summary of key engagement between the Applicant and CCC

Date	Format	Topic/Description
General		
June 2022	Meeting	Informal project catch-up and consultation feedback with CCC.
September 2022	Meeting	All host authority workshop.
October 2022	Meeting	Informal project catch up with CCC
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
October 2023 - Ongoing	Meeting	Monthly informal catch-up Teams calls.
November 2023	Meeting	All host authority workshop.

Date	Format	Topic/Description
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
May 2024	Meeting	Consultation plan discussion with CCC.
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 (Outline LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultations
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid issued the 2nd iteration draft versions of the Outline CoCP and Outline LEMP to all host authorities for comment.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on the 2nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop

Date	Format	Topic/Description
May 2025	Meeting	Meeting to discuss targeted consultation feedback
May 2025	Meeting	Meeting to discuss draft Statement of Common Ground
May 2025	Email correspondence	National Grid issued an updated iteration of the draft Outline Code of Construction Practice (oCoCP)
May 2025	Email correspondence	National Grid issued a new appendix to the draft oCoCP - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email correspondence	National Grid issued the Long List of Other Developments
June 2025	Meeting	Meeting to discuss draft Statement of Common Ground
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
October 2025	Meeting	An optional thematic group meeting to discuss feedback on the Hydrology and Land Drainage section of the Environmental Statement.
October 2025	Meeting	Meeting to discuss tree replacement management within Chelmsford
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority
January 2026	Meeting	Meeting to discuss the Statement of Common Ground

Date	Format	Topic/Description
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
April 2026	Email	National Grid shared the Statement of Common Ground and associated summary tables.
May 2026	Email	National Grid 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 CCC and other authorities.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	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 Outline CoCP.
January 2025	Email Correspondence	National Grid issued the Protected Species Proposed Mitigation Measures to stakeholders including CCC

Date	Format	Topic/Description
January 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	National Grid shared the Biodiversity Net Gain Strategy.
January 2025	Meeting	National Grid hosted 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	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on the second iteration of the Outline LEMP and Outline CoCP.
May 2025	Meeting	National Grid hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Option thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
January 2026	Meeting	Meeting to discuss Statement of Common Ground with Essex Place Services.
May 2026	Meeting	Meeting to discuss Statement of Common Ground with Essex Place Services.
May 2026	Meeting	Meeting to discuss bat licences with Essex Place Services.
Air Quality		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.

Date	Format	Topic/Description
Noise and Vibration		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
Health and Wellbeing		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
October 2023	Email Correspondence	Chelmsford City Council requested that Wales Health Impact Assessment Support Unit (WHIASU) guidance and vulnerable groups checklist is included within the assessment.
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 EIA, including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Option thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement.
Historic Environment		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.

Date	Format	Topic/Description
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
March 2024	Email Correspondence	Project response to Stakeholder feedback on Heritage Viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
June 2024	Meeting	Archaeology Working Group Meeting.
July 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting.

Date	Format	Topic/Description
October 2024	Meeting	Archaeology Working Group Meeting.
November 2024	Meeting	Archaeology Working Group Meeting.
December 2024	Meeting	Archaeology Working Group Meeting.
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Historic Environment Thematic Group meeting to further discuss the Historic Environment Viewpoints.
February 2025	Technical note	National Grid shared the Draft Heritage Baseline Report with Annex C and D.
February 2025	Meeting	Historic Environment Thematic Group meeting to discuss the Heritage Baseline report.
February 2025	Meeting	Archaeology Working Group Meeting.
March 2025	Email Correspondence	National Grid issued updated the Historic Environment Viewpoints information to stakeholders including CCC.
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
April 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Site 013
September 2025	Technical note	National Grid shared Priority Geophys Prelim Grayscales with stakeholders for consideration

Date	Format	Topic/Description
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement.
November 2025	Technical Note	National Grid shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Technical Note	National Grid shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Initial meeting to discuss matters relating to heritage in the Chelmsford Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common gGround being covered by EPS.
January 2026	Meeting	Meeting to discuss matters relating to built heritage in the Chelmsford Statement of Common Ground
February 2026	Email Correspondence	National Grid shared the Supplementary Environmental Information submitted to Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group
March 2026	Meeting	Archaeology Working Group
April 2026	Meeting	Archaeology Working Group
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group
May 2026	Email	National Grid shared the Outline AMS and OWSI for further comment.
May 2026	Email	National Grid shared the Geoarchaeological Monitoring of GI WSI for 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.

Date	Format	Topic/Description
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.
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 (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	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.
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 CCC and other stakeholders following the Landscape Thematic Group Meeting.

Date	Format	Topic/Description
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 South.
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
October 2024	Email Correspondence	National Grid shared updated viewpoint information data following from the landscape thematic workshops
November 2024	Meeting	Thematic group meeting to discuss viewpoints and methodology.
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
March 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
May 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
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 CCC.

Date	Format	Topic/Description
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
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	National Grid shared a 3rd Technical note to agree the study area and assessment criteria for comment.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the Socio-economics, Recreation and Tourism section of the Environmental Statement.

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
CCC	Chelmsford City Council
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
EPS	Essex Place Services
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
LIR	Local Impact Report
MIIA	Mineral Infrastructure Impact Assessment
MRA	Minerals Resource Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NG	National Grid
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WHIASU	Wales Health Impact Assessment Support Unit

Abbreviation	Full Reference
WIIA	Waste Infrastructure Impact Assessment
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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