

1. Rule 17 Letter dated 14 July 2026 - Request for further information relating to: the Development Consent Order; compulsory acquisition and temporary possession of land and rights; biodiversity, ecology and the natural environment; the historic environment; land use, soils and green infrastructure; landscape and visual effects; safety and security; socio economics, recreation and tourism; and the water environment

1. Development Consent Order (Draft)

1.1 Requirement 11: Biodiversity Net Gain At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) [REP6 030]. In Schedule 3 of [REP6-030] a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend.

Chelmsford City Council defers to the comments submitted by Essex County Council on this matter.

1.3 Validation checklists for discharge of requirement submissions/ requirement 15 of Schedule 3 (Employment and Skills Plan)

The ExA draws the attention of all relevant local authorities to the applicant's response to questions 1c and 2b of [REP6-132]. Question 1c relates to the possible use of development validation checklists for the discharge of requirement submissions.

The applicant previously responded on this matter in [REP4-303], acknowledging such check lists could be helpful, noted it would be appropriate for drafting to be proposed by the host authorities for its consideration. The applicant advises "No drafting has yet been proposed however the applicant will continue discussions on this matter with the host authorities as it progresses ways of working for the discharge of requirements."

All local authorities are asked to signpost where such drafting has been previously provided in examinations submissions or to enter such drafting into the examination.

Chelmsford City Council would support the inclusion of validation checklists alongside a comprehensive approach to pre application engagement by the Applicant, to provide certainty over the scope of information to be provided in support of the discharge of requirements.

Chelmsford City Council welcomes early engagement by the Applicant on the Draft Discharge of Requirements Strategy and Written Scheme of Stages document they have produced which sets out a commitment to pre application engagement on the discharge of requirement

As a minimum , it is considered that any checklist should cover:

- Accurate description
- Accurate plans with clear and logical drawing numbering and, where relying on plans already approved, full citation of these plans with link to / attached (living library of current approved plans also under discussion for compliance / enforcement)
- Full context / trail of relevant approved outline / final management plans, drawings and DCO provisions that underpin / support. To include doc ref, page numbers, para numbers for as much detail as possible.
- Full context of response to draft DOR submission and comments / decision
- Details of any relevant licensing or other agreement

This approach is currently under discussion in connection with the discharge of requirements for Bramford to Twinstead.

Question 2b concerned the Employment and Skills Plan (ESP) and whether requirement 15 of schedule 3 of the draft DCO should be worded to require the document submitted pursuant to that requirement to be approved by the relevant discharging authorities. In the light of the applicant's comments on this matter, as set out in [REP6-132], the ExA seeks the views of all relevant local authorities on this matter, especially in relation to the tests of necessity, relevance to planning, relevance to the development sought, enforceability, precision and reasonableness in all other respects.

Chelmsford City Council defers to the comments submitted by Essex County Council on this matter.

1.4 Outline Code of Construction Practice Appendix E (Community Engagement and Public Information) and Appendix F (Outline Noise and Vibration Management)

The applicant responded to ExQ2 questions DCO 2.S3 and DCO 2.S6 in [REP6-115]. Revisions were made to the 'Outline Code of Construction Practise Appendix E - Community Engagement and Public Information' [REP6-078] and the 'Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management' [REP6-080].

The ExA seeks a response from all local authorities who responded to ExQ2 [PD-023] DCO 2.S3 and DCO 2.S6, regarding the adequacy of the revisions submitted, bearing in mind their previous responses to ExQ2 submitted at deadline 5.

The Council again note that the question is in two parts; one related to Appendix E and one related to Appendix F. This response splits out the two questions for ease of reference.

Appendix E - Community Engagement and Public Information

Chelmsford City Council acknowledges that the revisions made to Appendix E address a number of the concerns previously raised, including provision of a complaints register, dedicated community relations arrangements, complaint investigation procedures, escalation routes and review of recurring issues.

The revised drafting does not include all of the measures previously requested, particularly in relation to approval of the subsequent detailed complaints procedure, defined acknowledgement timescales, provision of complaints data to the relevant planning authority and identification of a named responsible officer. Whilst the revisions represent a significant improvement on the previous drafting, the Council considers that further amendments (as outlined above) could strengthen transparency and oversight during the construction phase.

1.5 Outline Landscape and Ecological Management Plan and ecological working group

In its response to ExQ2 DCO 2.S5, Suffolk Wildlife Trust advised it was happy to support the wording, including in relation to the wording of a requirement, for an ecological working group, as proposed and submitted by Suffolk CC [REP5-270].

The applicant has amended the outline Landscape and Ecological Management Plan (LEMP) [REP6-084] to confirm the remit of the ecological working group broadly aligns with the text suggested by Suffolk Wildlife Trust [REP1 278].

The establishment of such a working group is supported by Essex CC ([REP5-241], [REP5-243]), who also request the expansion of the scope of the group to include landscape matters, which is reflected in the outline LEMP [REP6-084].

To Suffolk Wildlife Trust, Suffolk CC and Essex CC:

c) Advise whether you are satisfied in regard to the applicant's wording, as set out in the applicant's outline LEMP [REP6-084], which it advises broadly aligns with Suffolk Wildlife Trust's suggested text, as contained in its deadline 1 submission [REP1-278] at paragraph 2.3. d) Provide examples of the types of landscape matters that you consider should fall within the remit of this working group.

Chelmsford City Council defers to the comments submitted by Essex County Council on this matter.

3. Biodiversity, ecology and the natural environment

3.1 Assessment of impacts on bat species and proposed mitigation

In paragraphs 6.1.11 to 6.1.14 of the revised version of the outline LEMP [REP6-084], the applicant has included further details of mitigation measures for bat species.

To all local authorities and Natural England: Comment on whether the amendments made to the revised outline LEMP [REP6-084] now satisfy your concerns in relation to the assessment of impacts on bats and proposed mitigation. This should include whether you think the 10% figure, as proposed in paragraph 6.1.12, would be sufficient. If you have any remaining concerns then please set these out, including what specific actions you consider should be undertaken by the applicant to resolve your concerns.

Chelmsford City Council defers to the comments submitted by Essex County Council on this matter.

6. Landscape and visual

6.2 Masterplans

A number of IPs have made representations at deadline 6 concerning the Masterplans [REP5 199]. The ExA acknowledge that these plans have been produced in consultation with local authorities, their draft status, and that such plans are illustrative in nature. The ExA also note the applicant's point of view, as made in ISH4 and restated in [REP6-118] that the provisions within the masterplans are not necessary to make the application acceptable in planning terms.

To all local authorities: a) Provide your views on the potential mechanism provided by the applicant to provide funding for provision of landscape compensation (as contained in Annex of [REP6-118]).

Chelmsford City Council defers to the comments submitted by Essex County Council on this matter.

6.4 Good design

The ExA notes the design review panel (DRP) proposals contained within the DAS [REP6-090] and DASSI [REP6-092] and the provisions for local planning authorities, Dedham Vale National Landscape officials, wildlife trust representatives and North Falls and Five Estuaries project representatives to be invited to meetings where relevant.

To all local authorities and the Wildlife Trusts: d) Provide your views on the DRP proposals and any other final comments you wish to make on the subject of good design.

Chelmsford City Council has reviewed the Design Review Panel (DRP) proposals contained within the Design and Access Statement (REP6-090) and welcomes the detail provided regarding the proposed governance arrangements, membership, scope and review stages. However, there are concerns that the DAS [REP6-090] refers to this as a GGP-led design review panel, additionally the Design Development Champion is also a "senior figure from National Grid", and the Design Executive is the design team at the delivery stage. This raises a question as to the impartiality of the design processes around the project; for the design review process to be robust, the design panel must be independent balancing the need for functionality and security, whilst delivering the best local design and environmental outcomes for the project.

The Council accepts that operational, engineering, safety and security requirements will limit the degree of design flexibility available for electricity transmission infrastructure, the effectiveness of the DRP will depend upon the extent to which its recommendations are genuinely reflected within the final detailed design.