Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

AENC-NG-CNS-REP-0024

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.11 Signed Statement of Common Ground - Brentwood Borough Council - Tracked Changes Version

Final Issue E

July 2026

Planning Inspectorate Reference: EN020027

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

nationalgrid

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
D	10 June 2026	Deadline 5
E	21 July 2026	Deadline 7

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Contents

1.	**Introduction**	**1**
1.1	Overview	1
1.2	Summary of Matters Under Discussion	2
1.3	Project Description	~~10~~3
1.4	Format and Structure of this Document	~~11~~4
2.	**Record of Key Engagement**	**~~12~~5**
2.1	Introduction	~~12~~5
2.2	Summary of Key Engagement	~~12~~5
3.	**Matters Agreed, Not Agreed or Under Discussion**	**~~26~~16**
3.1	Overview	~~26~~16
3.2	Project Development, Description and Design	~~27~~17
3.3	Ecology and Biodiversity	~~37~~31
3.4	Air Quality	~~54~~48
3.5	Noise and Vibration	~~59~~52
3.6	Health and Wellbeing	~~68~~59
3.7	Historic Environment	~~76~~67
3.8	Landscape and Visual	~~92~~84
3.9	Socio-economics, Recreation and Tourism	~~104~~98
3.10	Cumulative Effects	~~110~~104
3.11	Development Consent Order	~~118~~112
~~3.12~~	~~Other Matters~~	~~121~~
4.	**Confirmation of Agreement**	**~~129~~123**

Table 2.1	Summary of Key Engagement between National Grid and Brentwood Borough Council	~~12~~5
Table 3.1	Agreement status for matters presented in Section 3	~~26~~16
Table 3.2	Matters Agreed, Not Agreed or Under discussion in relation to project development, description and design matters	~~27~~17
Table 3.3	Matters Agreed, Not Agreed or Under discussion in relation to Ecology and Biodiversity	~~37~~31
Table 3.4	Matters Agreed, Not Agreed or Under discussion in relation to Air Quality	~~54~~48
Table 3.5	Matters Agreed, Not Agreed or Under discussion in relation to Noise and Vibration	~~59~~52
Table 3.6	Matters Agreed, Not Agreed or Under discussion in relation to Health and Wellbeing	~~68~~59
Table 3.7	Matters Agreed, Not Agreed or Under discussion in relation to Historic Environment	~~76~~67
Table 3.8	Matters Agreed, Not Agreed or Under discussion in relation to Landscape and Visual	~~92~~84
Table 3.9	Matters Agreed, Not Agreed or Under discussion in relation to Socio-economics, Recreation and Tourism	~~104~~98
Table 3.10	Matters Agreed, Not Agreed or Under discussion in relation to Cumulative Effects	~~110~~104

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Table 3.11 Matters Agreed, Not Agreed or Under discussion in relation to Development Consent Order - ~~118~~ 112

Table A.1 Comments on the draft DCO ~~122~~117

Abbreviations ~~130~~124

Appendix A Draft DCO Wording

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

1. Introduction

1.1 Overview

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

1.1.2 This SoCG has been prepared by National Grid as the Applicant and Brentwood Borough Council (BBC). ~~Brentwood Borough Council~~BBBC 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 and submissions into the examination. 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~~has been extensive and is summarised in Chapter 2. The SoCG is an evolving document and detailed wording within it is still being discussed between the parties.

1.1.6 This ~~draft~~final 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 Brentwood Borough Council at key points for discussion.~~7, in accordance with the Rule 8 letter **[PD-011]**. The parties will continue to work together beyond Deadline 7, seeking further resolution where appropriate.

~~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.~~

1.1.7 ~~1.1.9~~ This SoCG has been structured to reflect topics of the Application which are relevant to BBC. The applicable matters considered within this SoCG apply to BBC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):

- Project development, description and design
- Ecology and Biodiversity

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

- 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

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

1.2 Summary of Matters Under Discussion

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

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.3.15 – Biodiversity Net Gain (BNG) – Onsite and Assessment 3.3.16 – BNG Offsite3.2.13 – Legal Agreements	BBC requests assurance that BNG initiatives will be relevant to the affected areas of the authority and co-developed with the relevant stakeholders. The Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. As noted in, **7.1 Biodiversity Net Gain Report [APP-299]**, while every effort has been made to deliver the required biodiversity units onsite, this 10% net gain is not fully achievable onsite. Off-site biodiversity units are therefore proposed to make up this deficit. Further details on the long-term monitoring and management of BNG is provided in response to BIO 1.45 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**The Applicant will secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.	Resolution likely by Deadline 7Discussions will conclude after finalisation of this SoCG through wording of the requirements.
3.3.17 – Arboriculture Impact Assessment (AIA)	BBC objects to the removal of veteran trees and any direct or indirect impact on ancient woodland. BBC considers that the proposed mitigation is inadequate. The Applicant maintains that **6.13 ES Appendix Arboricultural Impact Assessment [REP1-065]** was prepared in accordance with Appendix J of 6.19 Scoping Report - including appendices B to **K [APP-296]** and is considered appropriate for this stage of the project. The Applicant reiterates that commitments through the **7.2 Outline Code of Construction Practice [REP4-164]** and **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** seek to retain trees wherever possible and set out mitigation and compensation measures for veteran trees and ancient woodlands.	Matter unlikely to be agreed.
3.3.20 – Baseline conditions and receptors (bats) 3.3.21 – Standard mitigation (bats)3.2.14 –	BBC state further survey effort is feasible and would support a better estimation of impact and therefore more proportionate mitigation/compensation. The Applicant confirms that the methodology for surveying bat roosts has taken a pragmatic approach given the scale of the Project and has been agreed with Natural England. Full	Resolution likely by Deadline 7Discussions will conclude after finalisation of this SoCG through wording of the requirements.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
Landscape and visual compensation	~~aerial/emergence bat surveys will be undertaken on trees due to be lost during the detailed design phase of the Project.~~ ~~The Applicant maintains that baseline conditions and receptors presented are considered appropriate.~~National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests	
~~Noise and Vibration~~		
~~3.5.7 – Embedded mitigation~~ ~~3.5.8 – Standard mitigation~~ ~~3.5.9 – Additional mitigation~~ ~~3.5.10 – Construction effects~~ ~~3.5.12 – Outline CoCP~~	~~BBC considers the Noise and Vibration embedded mitigation measures insufficient given the proximity of works to residential areas and recreational spaces and is concerned about monitoring and response protocols proposed.~~ ~~The Applicant maintains that the proposed mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~ ~~**7.2 Outline Code of Construction Practice [REP4-164]**~~ ~~and~~ ~~**7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [REP4-170**~~] ~~include protocols for vibration monitoring in situations where there is potential for damage to buildings or structures, as well as the commitment for pre- and post-condition surveys.~~	~~Resolution likely by Deadline 7.~~
~~Health and Wellbeing~~		
~~3.6.6 – Baseline conditions, receptors and mitigation~~ ~~3.6.7 – Construction effects~~ ~~3.6.9 – Outline CoCP~~	~~BBC is concerned that the working hours will cause unacceptable disturbance and harm to public amenity. The Applicant maintains that the baseline conditions and receptors are considered appropriate. The Applicant states that the proposed construction working hours have been assessed through the ES with the noise and vibration, and traffic and transport assessments concluded no significant effects during construction when the proposed mitigation measures set out in~~ ~~**7.2 Outline Code of Construction Practice, [REP4-164]**~~ ~~are implemented. a more detailed response in presented in Table 4.14 ID 6.45, 6.46 of~~ ~~**8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~	~~Matter unlikely to be agreed.~~

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
Historic Environment		
3.7.6 – Data sources (Archaeology) – survey data 3.7.10 – Key parameters and assumptions	BBC notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. ECC maintain they are unable to agree key parameters and assumptions until field work has been completed. The Applicant maintains that sufficient data has been collected to inform assessment, but notes that survey work is ongoing with results likely in August 2026.	Matter unlikely to be agreed.
3.7.13 – Embedded mitigation	BBC has concerns that the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. The Applicant maintains that the embedded mitigation is considered appropriate and adequate.	Matter unlikely to be agreed.
3.7.14b – Standard mitigation (Built heritage)	BBC maintains that H07 should be expanded to have a method of contact during construction. The Applicant states that the current approach is considered appropriate and further details regarding construction vibration effects on listed buildings have been provided in response to ExQ1 HE 1.11.	Matter unlikely to be agreed.
3.7.16 – Additional mitigation 3.7.24 – Outline Archaeological Mitigation Strategy and Outline WSI	BBC's position is that agreement on this matter will depend on the methodologies proposed in the Outline AMS-WSI. The Applicant is currently preparing an updated version **of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** scheduled for submission at Deadline 5.	Resolution likely by Deadline 7.
Landscape and visual		
3.8.1 – Policy and legislation	BBC has concerns that the some of the evaluation of valued landscapes is flawed, and the judgement on significance. The Applicant maintains that all relevant legislation, policy and guidance haves been identified and appropriately considered to inform the assessment.	Matter unlikely to be agreed.
3.8.3 – Data sources	BBC has concerns regarding gaps in viewpoint distribution and with the approach to landscape value and value of the view. ECC also requests improvements to presentation to improve access and interpretation.	Matter unlikely to be agreed.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
	The Applicant states that sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual.** The Applicant states that the request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]** was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure.	
3.8.4 – Assessment methodology (including LVIA methodology)	BBC confirmed viewpoint methodology is still under discussion. The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed.	Matter unlikely to be agreed.
3.8.5 – Key parameters and assumptions 3.8.6 – Baseline conditions and receptors	BBC has concerns about unacceptable landscape and visual harm and seeks undergrounding to be considered in sensitive areas. The Applicant maintains that the key parameters and assumptions presented are considered appropriate. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed.	Matter unlikely to be agreed.
3.8.7 – Embedded mitigation	BBC has concerns on landscape and visual effects around Haverings Grove and requests for undergrounding to be considered, and the removal of 132kV in the area to reduce cumulative effects. The Applicant maintains that the embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and sets out the options considered in this area as presented in the Design Development Report. A more detailed response on the Applicant's position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	Matter unlikely to be agreed.
3.8.8 – Standard mitigation 3.8.9 –	BBC is concerned that mitigation measures proposed does not address residual landscape effects or compensation. The Applicant maintains that the proposed	Matter unlikely to be agreed.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
~~Additional mitigation~~	~~mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~	
~~3.8.10 – Construction effects~~	~~BBC is concerned that the potential tree and hedgerow loss has not been meaningfully quantified in relation to landscape and visual.~~ ~~The Applicant maintains that the assessment of effects during construction presented is considered appropriate and refers to the vegetation loss assessment is set out in 2.16 Trees and Hedgerows to **be Removed and or Managed Plans - Section a [APP-048].**~~	~~Resolution likely by Deadline 7.~~
~~3.8.11 – Operational (and maintenance) effects~~	~~BBC request the consideration of further re-routing and undergrounding to reduce significant landscape and visual effects.~~ ~~The Applicant confirms that the approach to the LVIA follows professional guidance and was discussed with stakeholders. The Applicant considers that the judgements made as part of the assessments remain fair and reasonable.~~	~~Matter unlikely to be agreed.~~
~~3.8.12 – Outline CoCP~~	~~ECC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete. BCC supports ECC position.~~	~~Resolution likely by Deadline 7.~~
~~3.8.13 – Outline LEMP~~	~~BBC request clarity on the different types of mitigation, timescales for planting care and request an ongoing role/consultation to ensure long term planting success.~~ ~~The Applicant notes that **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**~~ ~~The Applicant has also provided responses to concerns raised related to aftercare of replacement planting and mitigation within Environmental Areas in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~	~~Resolution likely by Deadline 7.~~
~~Cumulative Effects~~		
~~3.10.10 – Construction effects~~	~~BBC considers that the cumulative impacts of Dunton Hills Garden Village and Lower Thames Crossing have not been adequately assessed in accordance with NPS EN-1 and EN-5.~~ ~~The Applicant reiterates that the assessment was~~	~~Resolution likely by Deadline 7.~~

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
	undertaken in accordance with the **6.19 Scoping Report [APP-288 -to APP-296]** and **6.20 Scoping Opinion [APP-297]** which includes these two projects. BBC request evidence of engagement with National Highways to address cumulative effects. The Applicant refers to the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** for cumulative assessment of proposed developments and Primary Access Routes. BBC also raises concerns of the wider Brentwood Southern Growth Corridor, requesting the consideration of alternative access options. The Applicant confirms that flows from the Brentwood Enterprise Park are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within the transport assessments.	
3.10.12 – Outline CoCP	BBC is reviewing the updated **7.2 Outline Code of Construction Practice [REP4-164]** and will provide the Applicant with an update once complete.	Resolution likely by Deadline 7.
Development Consent Order		
3.11.1	BBC considers the proposed notice period for pre-commencement operations and wider timescales for discharge of Requirementsto too short to enable proper review, consultation, and decision-making. The Applicant considers the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate given no action is required by the authority, but has amended the Draft DCO to refer to “five business days” for consistency of terminology.	Matter unlikely to be agreed.
3.11.2	BBC considers the proposed determination period for discharge of Requirements insufficient to enable proper assessment, consultation, and decision-making, and raises concerns about the risks associated with deemed consent provisions. The Applicant has revised the proposed period to 25 business days (equivalent to 35 days) and considers this proportionate and necessary to avoid project delays. The Applicant notes that this period can be extended by agreement in writing	Matter unlikely to be agreed.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

SoCG ID	Summary of matter under discussion	Deadline for resolution
	~~where required. The Applicant considers deemed discharge provisions to be appropriate and precedented, and necessary to avoid delays to a project of critical national importance.~~	
3.11.3 – Register of requirements	BBC requests that a register of requirements should be included for transparency and accountability. The Applicant will continue to liaise with BBC on this matter in light of the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements. The Applicant considers that each discharging authority should maintain its own register, and, if DESNZ does not publish a register, will provide a register of requirements where DESNZ is the discharging authority.	~~Resolution likely by Deadline 7~~Engagement on this matter will continue post DCO examination.
3.11.4 – BNG delivery plan	BBC considers that a post-consent ecological mitigation programme and BNG delivery plan should be secured through a DCO Requirement. The Applicant proposes to secure at least 10% BNG through a ~~unilateral undertaking and does not consider additional Requirements necessary~~requirement.	~~Matter unlikely to be agreed~~Engagement on this matter will continue post DCO examination.
Appendix A – Draft DCO Wording	Discussions are ongoing in relation to detailed drafting points on: ~~Decision-making and approval timescales;~~ ~~Scope of authorised development;~~ ~~Limits of deviation;~~ • DCO Structure • Definition of "Maintain" • Definition of "relevant planning authority" • Order limits • Disapplication of Hedgerows Regulations Pre-commencement operations; • Draft protective provisions; and • Inclusion of as register of requirements.	Resolution likely by Deadline 7.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

when designing, constructing and operating assets such as those proposed for the Project.

1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

2. Record of Key Engagement

2.1 Introduction

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

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

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

2.2 Summary of Key Engagement

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

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

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

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
		from stakeholders on the 2nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop
May 2025	Meeting	All host authority workshop
May 2025	Email correspondence	The Applicant issued an updated iteration of the draft Outline Code of Construction Practice (oCoCP)
May 2025	Email correspondence	The Applicant issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email correspondence	The Applicant issued the Long List of Other Developments
June 2025	Email Correspondence	The Applicant issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	The ~~Applicantissued~~Applicant issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
Ecology and Biodiversity		
July 2022	Email Correspondence	The Applicant shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - the Applicant presented on the Biodiversity Assessment Methodology and Arboriculture

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
		Assessment Methodology and sought feedback from BBC and other authorities.
September 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	The Applicant issued the Protected Species Proposed Mitigation Measures to stakeholders including BBC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant shared the Biodiversity Net Gain Strategy.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the draft Biodiversity Net Gain Report.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on the second iteration of the Outline LEMP and CoCP.
January 2025	Email Correspondence	The Applicant shared second iteration of the Outline LEMP.
January 2025	Email Correspondence	The Applicant issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment.
January 2025	Email Correspondence	The Applicant issued the Biodiversity Net Gain Assessment Strategy.
March 2025	Email Correspondence	The Applicant issued the draft Arboriculture Impact Assessment (AIA).
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
		for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	The Applicant issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
Historic Environment		
July 2022	Email Correspondence	The Applicant issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	The Applicant presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and 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	The Applicantshared the updated viewpoints

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
	Correspondence	(including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	The Applicant shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
March 2024	Email Correspondence	Project response to Stakeholder feedback on Heritage Viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
February 2025	Meeting	Historic Environment Thematic Group Meeting to discuss the Historic Environment Viewpoints.
February 2025	Technical note	The Applicant shared the Draft Heritage Baseline Report with Annex C and D.
February 2025	Meeting	Thematic Group Meeting to discuss the Heritage Baseline report
March 2025	Email Correspondence	The Applicant issued updated the Historic Environment Viewpoints information to stakeholders including BBC.
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	The Applicant share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting.
August 2025	Meeting	Archaeology Working Group Meeting.
September 2025	Meeting	Archaeology Working Group Meeting.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement.
November 2025	Meeting	Archaeology Working Group Meeting.
December 2025	Meeting	Archaeology Working Group Meeting.
January 2026	Meeting	Archaeology Working Group Meeting.
February 2026	Meeting	Archaeology Working Group Meeting.
March 2026	Meeting	Archaeology Working Group Meeting.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
April 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
June 2026	Meeting	Meeting with EPS Archaeology to discuss the Statement of Common Ground.
June 2026	Meeting	Meeting with EPS Built Heritage to discuss the Statement of Common Ground.
June 2026	Meeting	Archaeology Working Group Meeting.
July 2026	Meeting	Archaeology Working Group Meeting.
July 2026	Email	Updated draft of Geoarchaeological monitoring of GI WSI Shared.
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	The Applicant held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Essex. The Applicant sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
April 2023	Meeting	The Applicant held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	The Applicant shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
		with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	The Applicant held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	The Applicant shared the shapefiles for the landscape viewpoints and order limits with BBC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape and Visual Thematic Group Meeting – LVIA Viewpoints within Essex South and Thurrock
October 2024	Meeting	The Applicant held a meeting to discuss on the draft versions of the Outline LEMP and Outline CoCP.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	The Applicant shared updated view point information data following from the landscape thematic workshops
November 2024	Meeting	Thematic group meeting to discuss viewpoints and methodology.
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology.
March 2025	Email	The Applicant issued the draft Arboricultural Impact

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
	Correspondence	Assessment (AIA).
May 2025	Email Correspondence	The Applicant shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
October 2025	Meeting	Further optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
March 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BBC's Local Impact Report.
May 2026	Meeting	Meeting with Essex Place Services representing Brentwood on the Statement of Common Ground.
June 2026	Meeting	Meeting with Essex Place Services representing Brentwood on the Statement of Common Ground.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including BBC.
June 2023	Technical Note	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Date	Format	Topic/Description
		businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	The Applicant shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	The Applicant held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

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

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

Table 3.1 Agreement status for matters presented in Section 3

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

3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process, including through detailed design.

3.1.4 Table 3.2 to Table 3.11 provides the matters agreed, not agreed or under discussion in relation to the various topics.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

3.2 Project Development, Description and Design

Table 3.2 Matters Agreed, Not Agreed or Under discussion in relation to project development, description and design matters

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** National Grid provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [~~REP1132~~REP3-023].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	BBC recognises the national importance of delivering grid reinforcement to support the transition to a low-carbon energy network. However, the Council objects to the Norwich to Tilbury proposals as currently submitted because it considers that they ~~fail~~have failed to demonstrate full consideration of credible alternatives and that they do not adequately address the significant environmental, social, and economic impacts on Brentwood's communities, landscape, heritage, and strategic growth areas.	Not agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
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].** National Grid provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [~~REP1-132~~REP2-023].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	~~BBC Response to Targeted Consultations (March 2025):~~ BBC ~~acknowledge~~acknowledges that the grid capacity offered by the Norwich to Tilbury project is needed by the timescales proposed, noting NESO's Clean Power Action Plan. However, BBC also supports the ECC position that the applicant must not restrict the justification ~~on~~of future network expansion solely based on the ESO contracted position, particularly when this ~~limits~~has limited the proper consideration of alternatives – in particular offshore alternatives - in accordance with good planning.	Not agreed
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	While BBC recognises the national need for grid reinforcement, it considers that the submission of this DCO ~~(Development Consent Order)~~ application is premature because credible alternatives have not been fully and properly assessed. The Council objects to the application	Not agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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. 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].** In relation to the use of an overhead line at Dunton Hills Garden Village, **7.21 2024 - Design Development Report for the Project [APP-359]** identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed	on this basis and urges the Applicant to undertake a comprehensive appraisal of options that could deliver the required capacity with significantly reduced environmental and community impacts. In particular, the Council seeks further investigation of a coordinated offshore solution and High Voltage Direct Current (HVDC) undergrounding, both of which were identified in the ESO East Anglia Network Study as viable alternatives. Furthermore, in the NG Eastern Green Link 3 and 4 Strategic Options Report, it is suggested in paragraph 5.0.3 that capital costs for alternative solutions are similar. Therefore, these options should be ~~evaluated~~fully and transparently evaluated, with robust cost-benefit analysis and consideration of planning, environmental, and socio-economic implications, before progressing with an overhead line solution. This is especially the case in the context of a national housing crisis and with BBC making strenuous efforts to deliver housing through its Local Plan to meet identified need against constrained suitable land availability, which is in no way aided by the OHL solution and the broader visual blighting of potential development land along the route within Brentwood and beyond.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		master planning, would substantially mitigate potential effects on developable land and indirect effects. Overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Project development process - Design				
3.2.5	Haverings Grove	The Applicant has taken into account the potential effect of its proposals when developing the route alignment. We have considered several alternatives in this area to move the alignment further west from Haverings Grove. We are proposing to underground part of the 132 kV overhead line in this area which therefore facilitates the change to the alignment slightly further to the west. The residual effects in the area around Haverings Grove will be reported in the Environmental Statement supporting the DCO. Temporary disruption to agricultural	BBC acknowledges ~~and welcomes~~ the changes to the proposals at Haverings Grove made during the ~~Applicants~~Applicant's targeted consultation, including the undergrounding of approximately 2km of the existing UKPN 132kV line, the repositioning of pylons TB209 to TB211, and the relocation of the temporary construction laydown area. However, despite these refinements reducing the earlier impact in this locality, the Council maintains its objection to the proposed alignment in ~~this locality~~Haverings Grove. The routing of the 400kV overhead line along the northern, western, and southern boundaries ~~of Haverings Grove~~	Under discussion Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		operations during construction would be reduced through good practice, such as maintaining/providing alternative access and water supplies, reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04 and AS05 within the **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**). These measures will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft ~~Development Consent Order [REP4-037~~DCO [REP5-060]** within the final Code of Construction Practice. All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project, as stated in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [~~APP-138~~Revision B]**. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	creates a harmful severing effect, acting as an imposing physical barrier between the settlement and Hutton. The proximity of the transmission line to residential properties at this 'pinch point' exacerbates the adverse impact on local amenity and community cohesion. The Council ~~reiterates~~has throughout maintained its request for serious consideration of alternative solutions, including re-routing or undergrounding, to mitigate these impacts. In addition~~, concerns remain~~ to the above, BBC remains concerned regarding the suitability of proposed access routes for construction compounds, which risk unacceptable disruption to local agricultural operations~~. BBC~~, and therefore seeks reassurance that these access arrangements have been fully assessed and that appropriate mitigation will be secured through enforceable requirements within the DCO.	
3.2.6	Dunton Hills Garden Village	The Applicant has taken into account the potential effect of its proposals when developing the route alignment. In this location we have to work within the context of the planning status of other projects, including the Dunton Hills Garden Village	Brentwood Borough Council considers that~~:~~ • the current ~~The Applicant has not adequately assessed the impact of the proposed alignment on the deliverability and viability of DHGV, contrary to Holford Rule 7 and NPS EN-1 and EN-5.~~	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		proposals. The Applicant has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5. The 2024 Design Development Report identified that there would be a direct loss of development footprint by the use of underground cable. The current proposed overhead line alignment follows the corridor created by the safety zone of an existing gas pipeline, which in combination with detailed master planning, would substantially mitigate potential effects on developable land and indirect effects. Due to the Applicant routeing the Project within an existing gas pipeline safety corridor, subject to final micro-siting, the total quantum of housing, or any other approved land use within the Dunton Hills Garden Village, will not be affected by the proposed overhead line. Neither will the proposed overhead line affect the overall viability and delivery of Dunton Hills Garden Village. Lands Improvements (LIH) has recently purchased the Dunton Hills Garden	• ~~Evidence commissioned by Essex County Council (Savills) indicates that overhead pylons could reduce residual land value by approximately £17.5m, materially affecting viability and the ability to deliver affordable housing and infrastructure.~~ • ~~The~~ proposals could potentially undermine the Garden Community principles ~~and~~at the heart of the current masterplan as well as the design quality required by Policy R01 and R02 of the Brentwood Local Plan. ~~The Council~~ BBC therefore requests that the Applicant~~:~~ • continues to engage ~~Demonstrates how the scheme will avoid or mitigate these impacts, including consideration of alternative alignments or undergrounding.~~ • ~~Provides clear commitments within the DCO to safeguard the delivery of DHGV and associated infrastructure.~~ • ~~Engages jointly with Brentwood, Essex, and Basildon to agree~~with BBC to finalise planting measures ~~that~~currently under development – beyond s106 requirements relevant to the proposal – to protect the delivery of strategic growth objectives and to ensure Garden Community principles remain central to future development.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Village site in the knowledge of the proposed overhead line and has recently completed the section 106 agreement relating to the planning permission for the development with the Council. The completion of the section 106 agreement confirms that the Council is happy that the Dunton Hills Garden Village development will provide an appropriate amount of affordable housing, in addition to all the other infrastructure and community facilities included in the agreement. Subject to agreement with the landowner, LIH, the Applicant can confirm its commitment to providing tree planting to the eastern side of the Dunton Hills Garden Village development. This tree planting would be in addition to that which will be provided by LIH as part of the garden village development, and the location of which will be guided by the approved outline masterplan for the site and be subject to further discussions with LIH, Brentwood Council and Essex County Council. For the Applicant's position on Dunton Hills Garden Village, please refer to Section 3.8 'Alternatives – Dunton Hills Garden Village' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** In addition, National Grid provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant**		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Representations [~~REP1-132~~REP2-023], at Deadline 3 in response to ExA question GEN 1.23 within 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and at Deadline 4 under GEN 1.23, 1.24 and 1.25 in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]. The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.		
3.2.7	Sensitivity of land east of Ingatestone	The Applicant has taken into account the potential effect of its proposals when developing the route alignment. The Applicant has developed its proposal in this area in line with EN-1 and EN-5, the starting assumption being overhead line as the area is not subject to a landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5. Heritage considerations is assessed in **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]** provides an assessment of the Projects likely significant effects on designated and	There remains concern that there is a continued risk of significant adverse heritage, landscape and visual effects in this location, highlighting the need for serious consideration of re-routing, undergrounding or alternative solutions by way of mitigation in this area of particularly valuable heritage and landscape sensitivity.	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of **5.6 Planning Statement [~~APP-085~~Revision B]** addresses the policy consideration of heritage impacts. **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [~~APP-215~~Revision B]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Regarding landscape and visual effects, paragraphs 13.10.1 to 13.10.12 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** provide an assessment of effects on landscape and visual receptors up to a distance of approximately 1.5 km from the Ingatestone and Fryerning Visual Receptor Area (VRA). Overall, the Applicant has considered these comments and, whilst respecting the fact that different assessors may reach different judgements, as noted in GLVIA3, the Applicant remains comfortable with the judgements made in the LVIA and the reasoning given. Refer to the Applicant's response to this matter in Table 4.16 ID 6.4.9-50 and Table 4.20 ID 6.59 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		On the basis of the assessments, no change to the technology in this location is proposed.		
Project development process - Consultation				
3.2.8	2022 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]** the non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	BBC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy. BBC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.	Agreed
3.2.9	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in 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.	BBC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy. BBC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.	Agreed
3.2.10	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of	BBC acknowledges the ~~statutory~~non-statutory consultation was undertaken in accordance with the ~~Statement of Community~~ Consultation Strategy.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		this consultation are outlined in the Statement of Community Consultation (SoCC).Statement of Community Consultation (SoCC). Responses to feedback received during statutory consultation is contained within the **5.1 Consultation Report [~~APP-066~~Revision B]**. The statutory consultation was undertaken in accordance with the published SoCC.	BBC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.	
3.2.11	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 and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation is contained within the **5.1 Consultation Report [~~APP-066~~Revision B]**. 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).	BBC acknowledges the ~~targeted~~non-statutory consultation was undertaken in accordance with the Consultation Strategy. BBC highlighted in its response to the targeted consultation and AoCM a number of areas where the consultation process - including the lack of feedback to the statutory consultation undertaken and which informed the scope of the targeted consultation - was considered harmful to the transparency and legitimacy of the process.	Agreed
Other matters as required				

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.2.12	Community Benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. ~~Later in spring 2026, the~~The Applicant will begin consulting in July 2026 on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent and construction starting. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits. The Applicant welcomes continued engagement with ~~the National Grid welcomes continued engagement with~~ BBC on this matter.	BBC has strongly encouraged NGET to ~~positively~~ respond positively to the issue of social value and community benefits as set out in ~~our~~the response to the statutory consultation in 2024, particularly having regard to the Government's recently published Community Funds for Transmission Infrastructure. ~~In particular,~~BBC considers that significant benefits ~~should be realised from N2T~~ for education, skills, and employment during construction and operation should in particular be realised from N2T.	Agreed
3.2.13	Legal Agreements	National Grid will secure measures to support the discharge of the statutory duty under section 245 of the Levelling-up and Regeneration Act 2023 (the 'furthering the purposes' duty) through a bilateral obligation with Suffolk CC under section 106 TCPA 1990. An updated unsigned agreement was submitted at Deadline 6 in **8.25 National Landscape - DRAFT -**	BBC welcomes the commitment to secure BNG and off-site tree planting via requirement. At the time of finalising this SOCG the wording of the requirements remains under discussion between the parties.	Under Discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [REP6-126]. Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting resulting from the commitment to replace individual trees and individual trees in small groups at a ratio of 3:1, by requirement and not by a unilateral s106 agreement. The Applicant is committed to continue discussions with BBC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.2.14	Landscape and visual compensation	As explained by Counsel for National Grid at ISH4, National Grid is also proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in **8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**, should the Secretary of State consider the measures	BBC support the position of Essex County Council on matters regarding the commitment to secure landscape compensation/offsetting measures.	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with BBC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		

3.3 Ecology and Biodiversity

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 ~~(~~- Key Legislation and Planning Policy Context~~)~~ [~~APP-126~~Revision B]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BBC ~~confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is~~agrees that all relevant legislation, policy and guidance has been identified and appropriately considered ~~agreed~~to inform the assessment.	Agreed
EIA – Approach and Methods				
3.3.2	Study area	The study area was agreed through	BBC agrees that the study area was agreed	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		the **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	
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~~Revision C]**. Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	BBC agrees that sufficient desktop and survey data has been collected to inform the assessment.	Agreed
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.	BBC agrees on the assessment methodology.	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. Refer to information positions presented in ID 3.3.19.	BBC agrees on the survey methods and scope for surveys outside the remit of Natural England.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
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~~Revision C]**. The key parameters and assumptions presented are considered appropriate. National Grid has committed to a five-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for development consent projects of this scale. This is further strengthened by embedded commitments to high-quality planting specifications, ongoing monitoring, and adaptive management, including replacement of failed planting where necessary, as set out within the **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [Revision B].** The Applicant does not agree that an assumed failure rate or additional compensation provision is necessary or justified, as the secured approach	BBC supports the current ECC position on this issue that ~~it is under review and that BBC will provide further comment following consideration around reinstatement~~a five-year aftercare period for all replacement tree and hedgerow planting is not considered sufficient and standard for a development project of this scale.	Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		already provides a robust, flexible and responsive framework to ensure successful establishment. Taken together, these measures provide confidence that habitat reinstatement will be effectively delivered and maintained, and that the proposed approach represents a proportionate, policy-aligned and deliverable solution. ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
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~~Revision C]**. The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season was submitted to PINS in November 2025, achieving coverage of 97% of the Order Limits **[AS-026** to **AS-045].**	BBC agrees that baseline conditions and receptors presented for Ecology and Biodiversity are appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough 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 **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that embedded mitigation is appropriate and adequate.	Agreed
3.3.9	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and set out in **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant ~~Grid~~ issued the 'Summary of Proposed Protected Species Mitigation' document on 16 January 2025. ~~NG will take~~National Grid took on board the comments received from BBC when further developing the mitigation outlined in the ES.	BBC agrees that standard mitigation is appropriate.	Agreed
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in **6.8**	BBC agrees that additional mitigation is appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision ~~B~~ ~~[AS-026~~C]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
EIA – Assessment Conclusions				
3.3.11	Construction effects	The assessment of effects during construction is presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]**. 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~~Revision C]** 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	BBC ~~supports the ECC position on this issue that it is still under discussion for reasons outlined in their SoCG~~agrees that subject to the agreed wording on bat compensation being added to the Outline LEMP at Deadline 6, that the assessment of effects presented is considered appropriate.	~~Under discussion~~ Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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 Relevant Representations [REP2-023]** and at Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-032]** ~~Following a meeting in May 2026 National Grid submitted to the Local Planning Authorities a bat resource compensation proposal for consideration~~The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with Brentwood Borough Council and has been added to **7.4 Outline Landscape**		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		and Ecological Management [Revision G]. This includes the provision of bat boxes/veteranisation of 10% of the potential bat roosting features lost ~~in any one Project Section~~. The Applicant ~~will continue to engage with BBC on~~considers this matter. Agreed.		
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC agrees on the presented assessment of effects during operation.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	~~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 -~~ ~~BBC agrees with the Outline CoCP on relevant mitigation measures and on the provision of further details on the ECoW qualifications/experience and support for the ECoW.~~ ~~**Draft DCO / Outline Management Plans / Mitigation and Monitoring**~~ **7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and is appropriate for managing	BBC agrees with the Outline CoCP on relevant mitigation measures and on the provision of further details on the ECoW qualifications/experience and support for the ECoW.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID		Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~Ecology and Biodiversity [AS-026] and is appropriate for managing construction impacts from the Project. Section 1 of the 7.4 Outline Landscape and Ecological Management Plan [REP3-030] states that it should be read alongside the mitigation measures described in the 7.2 Outline Code of Construction Practice [REP4-164].~~ ~~Full details of the ECoW's qualifications / experience will be provided within the Final CoCP which will be approved by~~	construction impacts from the Project. Section 1 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** states that it should be read alongside the mitigation measures described in **7.2 Outline Code of Construction Practice [Revision G].** Full details of the ECoW's qualifications / experience will be provided within the Final CoCP which will be approved by the relevant local planning authority. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further details on the ECoW can be found in the Applicant's response to BIO 1.26 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The remit of the Ecology Working Group will include review of individuals within the core ECoW team (once known post-consent), as a mechanism to demonstrate individuals have sufficient ECoW experience to adequately fulfil the role. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID		Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~the relevant local planning authority. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further details on the ECoW can be found in the Applicant's response to BIO 1.26 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].~~ ~~The remit of the Ecology Working Group will include review of individuals within the core ECoW team (once known~~			

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	~~post-consent), as a mechanism to demonstrate individuals have sufficient ECoW experience to adequately fulfil the role.~~ ~~The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.~~Outline CoCP			
3.3.14	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [~~REP3-030~~Revision GF]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]** and is appropriate. Section 1 of ~~the~~**7.4 Outline Landscape and Ecological Management Plan [~~REP3-030~~Revision G]** states that it should be read alongside the mitigation measures described in ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G].**	BBC acknowledges the new bat box compensation strategy and agrees that the outline LEMP, alongside the mitigation measures described in the outline CoCP, includes all relevant operational related mitigation measures and is appropriate. ~~BBC supports the ECC position that this matter is still under discussion, and that further clarification is sought around bat hibernation.~~	~~Under discussion~~ Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Natural England (the statutory responsible body for bats) has approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility. The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with BCC and		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		has been added to **7.4 Outline Landscape and Ecological Management [Revision G].** This includes the provision of bat boxes/veteranisation of 10% of the potential bat roosting features lost. The Applicant considers this matter Agreed.		
Other matters as required				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	The Applicant issued the 'Biodiversity Net Gain Assessment Strategy' document on 17 January 2025. Comments received were taken on board for the BNG assessment in **7.1 Biodiversity Net Gain Report [~~APP-299~~Revision B]**. 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	BBC would like an assurance that BNG initiatives will be relevant to the affected areas of the authority and co-developed with the relevant stakeholders~~. BBC also supports the ECC position that NG should aim for 20% rather than 10% BNG.~~, therefore would like this matter to remain under discussion. ~~BBC would like this matter to remain under discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved~~.	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		monitoring and management of BNG is provided in response to BIO 1.45 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** No concerns have been raised by BBC to National Grid on the assessment approach to BNG or the onsite mitigation proposals, with the exception of the five-year habitat management and monitoring period for the reinstatement planting. Although not technically applicable to this Project, newly released BNG guidelines (June 2026) do not require any management or maintenance of reinstatement planting. National Grid therefore stands by its position that the provision of five-years management and maintenance period for reinstatement planting is more than adequate, and its success can be sufficiently relied upon to include within the onsite BNG metric. The Applicant notes that BBC's outstanding concerns relate principally to the matter identified under ID 3.3.6. As that matter remains unresolved and is separately recorded as Not Agreed, the		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Applicant recognises that a mutually agreed position has not been reached on this topic and therefore this matter is also appropriately recorded as Not Agreed.		
3.3.16	Biodiversity Net Gain (BNG) - Offsite	The Applicant ~~will deliver~~is committed to delivering at least 10 % BNG with wider environmental and societal benefits on its construction projects. ~~The~~ **7.1 Biodiversity Net Gain Report [~~APP-299~~Revision B]** sets out the approach to BNG. While every effort has been made to maximise on-site habitat creation and enhancement, the scale and nature of the Project necessitates the use of off-site biodiversity units to achieve the overall BNG commitment. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. The Applicant recognises BBC's interest in ensuring that off-site BNG delivers benefits within their own administrative area. Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within ~~the~~ **7.1 Biodiversity Net Gain Report**	BBC notes that BNG is proposed, which is welcomed in principle, but as BBC considers that there is no clarity on how off-site habitat creation will benefit Brentwood or on how long-term monitoring will be secured beyond the proposed five-year aftercare period, BBC does not agree with this matter. ~~BBC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Offsite BNG.~~	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		[~~APP-299~~Revision B], the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, 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~~Revision B]** details the Applicant's approach and further details regarding the provision of off-site BNG are provided in response to BIO 1.47 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** In addition, refer to Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain Section in Chapter 3 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** See response to ID3.3.15. Offsite BNG will be secured by a requirement in the draft DCO and delivered through collaboration with partners and purchased from commercially registered providers.		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		The monitoring and management of the purchased offsite BNG is secured through appropriate legal agreements and Conservation Covenants, these agreements ensure the landowner meets their obligations and monitoring is delivered in accordance with the relevant Habitat Management and Monitoring Plan. The Applicant considers that the proposed approach provides a robust and secure mechanism for delivering and maintaining Biodiversity Net Gain. However, noting BBC's ongoing concerns regarding the location and delivery of off-site BNG, the Applicant acknowledges that a mutually agreed position has not yet been reached, and therefore the matter is recorded as Not Agreed.		
3.3.17	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 Applicant issued the draft Arboricultural Impact Assessment in March 2025.~~ The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including**	~~BBC objects to the removal of veteran trees and any direct or indirect impact on ancient woodland within its administrative area. The Council considers that the proposed mitigation is inadequate and fails to comply with EN-1 policy requirements for irreplaceable habitats. While the Applicant proposes a 3:1 replacement planting ratio, this constitutes reinstatement rather than compensation and lacks detail on stock size, biosecurity, and aftercare.~~ ~~BBC therefore requests that the Examining~~	~~Under discussion~~ Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		appendices B to K [APP-296] and is considered appropriate for this stage of the ~~project~~Project. The Applicant will be seeking to retain the veteran trees through their detailed design. Commitment GG14 of ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** states: *'Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.'* Mitigation and compensation measures for veteran trees and ancient woodland is detailed within **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [~~APP-323~~Revision C]**. The Applicant has committed to a 3:1 replacement ratio for individual trees and individual trees within small groups. Planting would be prioritised within the Order Limits, although off-site provision may be required. The onsite provision is considered to comprise mitigation, but the offsite provision will comprise compensation. Further details in relation to the onsite planting and aftercare will be provided and agreed	~~Authority secure enforceable commitments for a full Arboricultural Method Statement, justification for any veteran tree loss, and appropriate compensation measures. Replacement planting must meet minimum standards, including 10–12 cm girth stock sourced from biosecure nurseries and maintained in accordance with BS8545. In addition, the Council seeks a strategic tree and woodland compensation package beyond reinstatement to offset residual harm.~~BBC has reviewed the Arboriculture Impact Assessment and acknowledges the Applicant's commitment to retain veteran trees through detailed design. BBC also acknowledges the Applicant's commitment to prepare an Arboricultural Method Statement to be included as part of the final LEMP and to be approved by the relevant planning authorities, and as a result of these developments now considers this matter Agreed.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		with the relevant Local Planning Authorities pursuant to Requirement 9 and reinstatement planting. Details of the off-site planting in the form of an Offsite Planting Delivery Scheme will be provided pursuant to Requirement 9. The Applicant has committed to produce an Arboricultural Method Statement in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to be included as part of the final Landscape and Ecological Management Plan(s) approved by the relevant Local Planning Authority. ~~Paragraph 7.2.41 of the **5.6 Planning Statement [APP-085]** and Section 9.7 of the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-030]** set out the Applicant's position on landscape compensation with final details to be identified within the final LEMP.~~ ~~The **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms off-site provision for tree replacement may be required; where this is the case, this is considered to be compensation. Landscape compensation measures are considered in relation to the mitigation hierarchy but there is no requirement under policy to compensate for all residual effects.~~		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then falls to the planning balance.~~ ~~Regarding minimum standards, the Applicant has provided a response to this matter at Deadline 1 through **8.4 Applicant's Comments on Relevant Representations [REP2-023].**~~		
3.3.18	Data sources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]**. Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. The Applicant has provided a response to this matter at Deadline 1 in **8.4 Applicant's Comments on Relevant Representations [REP2-023]**.	BBC agrees that sufficient desktop and survey data has now been collected to inform the assessment.	Agreed
3.3.19	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~~Revision D]**. The survey approach to bat roost	BBC agrees that the survey methodologies agreed with Natural England are appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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].** Natural England advice related to bats is provided in **8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England [REP4-307]**. This letter states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed.		
3.3.20	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision ~~B [AS-026~~C]**. The baseline conditions and receptors presented are considered appropriate. The survey approach to bat roost	BBC ~~confirmed in meeting regarding the Statement of Common Ground in January 2026~~agrees that the baseline conditions and receptors ~~for roosting bats requires further information and review~~presented are considered appropriate, subject to the agreed wording on bat compensation added to the Outline LEMP at Deadline 6. .	~~Under Discussion~~ Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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~~Revision D]**. 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 agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with BBC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].** The Applicant considers this matter Agreed.		
3.3.21	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [~~AS-026~~Revision C]** and set out in ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	~~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~~	~~Under discussion~~ Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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~~Revision D]**. 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 agreed a bat box compensation strategy, the wording for which had been agreed with BBC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].** This includes the provision of bat boxes/veteranisation of 10 % of the potential bat roosting features lost. The Applicant considers this matter Agreed.	~~the concerns stated for ID 3.3.11.~~ ~~BBC confirmed in meeting regarding the Statement of Common Ground on 14 January 2026 that the standard mitigation for bats requires further information and review.~~BBC considers that the standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are considered appropriate and adequate, in terms of nature and scale, subject to the agreed wording on bat compensation added to the Outline LEMP at Deadline 6.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

~~3.4~~

Air Quality

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	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~~Revision B]** and Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BBC agrees that all relevant legislation, policy and guidance has been identified.	Agreed
EIA – Approach and Methods				
3.4.2	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.	BBC agrees with the study area.	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~~Revision B].**	BBC agrees that sufficient desktop data has been collected to inform the assessment as presented.	Agreed
3.4.4	Assessment	The methodology for assessing Air Quality	BBC agrees with the methodology for assessing	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	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.	Air Quality.	
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~~Revision B].** The key parameters and assumptions presented are considered appropriate.	BBC agrees that key parameters and assumptions presented are considered appropriate.	Agreed
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B].** The baseline conditions and receptors presented are considered appropriate.	BBC agrees that baseline conditions and receptors presented are appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded, standard and additional mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The construction dust assessment in **6.7**	BBC agrees that embedded, standard and additional mitigation is considered appropriate and adequate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B] and **6.7. A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [~~APP-150~~Revision B]** concludes that with the appropriate application of dust mitigation there would likely be no significant effect on sensitive receptors within 250m of the Order Limits. This would include sensitive receptors around Havering Grove. **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [~~REP4-166~~Revision D]** have been prepared to reflect the mitigation measures identified through the construction dust assessment undertaken in **6.7 Environmental Statement Chapter 7 - Air Quality ~~(Final Issue A) [APP-147~~[Revision B]** and **6.7. A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [~~APP-150~~Revision B]**. These mitigations measures already include dust suppression measures and restrictions on vehicle idling. Site-specific controls such as tailored monitoring at high-risk locations would be refined in finalised versions of the Code of Construction Practice and Dust Management Plan prepared by the Main Works Contractor(s). Responsibility for any monitoring undertaken would sit with the Main Works Contractor(s). The final		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		versions of the Outline CoCP and Dust Management Plan would be submitted for approval in accordance with Requirement 4 of **3.1 Draft ~~Development Consent Order [REP4-037~~DCO [Revision G]** prior to commencement of development.		
EIA – Assessment Conclusions				
~~3.4.10~~3.4.8	Construction effects	The assessment of effects during construction is presented **6.7 Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [~~APP-150~~Revision B].** Dust monitoring and dust suppression are included. The construction dust assessment was carried out in line with the IAQM construction dust assessment guidance. Dust is likely to be generated by the Project and mitigation is designed so there would be no significant effect on sensitive receptors, including those around Havering Grove. The mitigation measures specified are aligned with industry standard best practice IAQM construction dust guidance and are considered appropriate for the level of dust risk impact anticipated from the Project. There is scope in ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** for agreeing location specific mitigation measures once construction activities and locations are further developed through	BBC agrees with the assessment of effects during construction and proposed mitigation measures, and notes that there will be no significant effects on sensitive receptors, in particular those around Havering's Grove.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		detailed design. Refer to the Applicant's positions presented 3.4.7 above.		
~~3.4.11~~3.4.9	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.~~ ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter.~~ Effects related to maintenance and operational traffic are not assessed as this assessment was screened out in the **6.19 EIA Scoping Report [APP-296]** and was agreed within the **6.20 Scoping Opinion [APP-297].**	BBC agrees that ~~the assessment of effects during operation that has been presented is appropriate~~effects related to maintenance and operational traffic have been screened out and therefore have not been assessed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
~~3.4.12~~3.4.10	Outline CoCP	**7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant mitigation measures specified in **6.7 Environmental Statement Chapter 7 - Air Quality [~~APP-147~~Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [~~APP-150~~Revision B].**and is appropriate for managing construction impacts from the Project. Refer to the Applicant's positions presented 3.4.7 above.	BBC agrees that relevant mitigation measures included ~~on~~in the OCoCP ~~is~~are appropriate for managing construction impacts from the Project.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
~~Other matters as required~~				

3.5 Noise and Vibration

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [~~APP-126~~Revision B]** and Section 14.2 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [~~APP-256~~Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	BBC agrees with the study area.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented	BBC agrees that sufficient desktop data has been collected to inform the assessment.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		within Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [~~APP-256~~Revision B]**.		
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the Environmental Impact Assessment (EIA) in **6.19 Scoping Report [APP-288 ~~to~~- APP-296]** received from the Planning Inspectorate.	BBC agrees with the methodology for assessing Noise and Vibration.	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~~Revision B]**. The key parameters and assumptions presented are considered appropriate.	BBC agrees that the key parameters and assumptions presented are considered appropriate.	Agreed
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [~~APP-256~~Revision B]**. The baseline conditions and receptors presented are considered appropriate.	BBC agrees that the baseline conditions and receptors are considered appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	~~Embedded mitigation~~Mitigation (outline)	~~Embedded~~The consideration of mitigation measures~~, designed as an inherent part of the Project relevant to Noise and Vibration effects, are set out~~ are presented in Section 14.6 of **6.14 Environmental Statement**	BBC agrees that the outline mitigation measures identified in in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** are reasonable for the state of the assessment and demonstrate that, in	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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.**Revision B].** The assessment identifies outline mitigation options and shows how these can be employed to avoid significant adverse effects. This includes temporal restrictions which may be required, together with standard noise mitigation measures, to avoid significant adverse effects due to works during non-weekday daytime periods. The applicant concedes that the mitigation presented at ES stage is outline and the outcomes are dependent upon further work by the contractor, through consultation with BBC, particularly at a small number of key locations, such as works close to the noise sensitive receptors at Rayleigh Road, Hutton. However, it demonstrates that significant adverse effects can, in principle, be avoided. The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration. Further detailed construction noise and vibration assessment will be undertaken by	principle, significant adverse effects can be avoided. However, this is subject to further work by the contractor through consultation with BBC. The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate. BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.BBC confirmed agreement on this matter following a call on 15th June 2026 where they requested further	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~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]**.~~ ~~The Outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of **7.2 Outline Code of Construction Practice [REP4-164]** includes for pre- and~~	information be added to the National Grid position statement to reflect the discussion during the meeting.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~post-condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.~~ ~~The Applicant has provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**~~Commitments regarding further detailed construction noise and vibration assessments by the contractor, associated determination of specific mitigation measures, monitoring, and Section 61 agreements are discussed in Matter ID 3.5.11 below.		
~~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 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 does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood~~	~~The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.~~ ~~BBC notes that the ES identifies potential vibration impacts on sensitive structures during~~	~~Under discussion~~

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~Borough, due to construction noise and vibration.~~ ~~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]**.~~	~~construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.~~	
EIA – Assessment Conclusions				

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.5.93.5.8	Additional mitigationConstruction effects (weekday daytime periods)	The consideration of additional mitigation measures are presented in Section 14.6 ofassessment provided in **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. **Revision B]** indicates The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location includingthat no significant effects from construction noise or vibration are expected in the Brentwood Borough, due to construction noise and vibration. Council area. Specifically with 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),	BBC agrees that in principle, significant adverse effects from construction noise and vibration can be avoided during weekday daytime periods with standard mitigation measures, as secured by commitment NV01 of **7.2 Code of Construction Practice [REP4-165].** The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate. BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report	Under discussionAgreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~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~~construction works during weekday daytime periods, no significant adverse are expected where standard mitigation measures are employed, as secured by ~~NV05~~commitment NV01 of **7.2 Outline 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]~~Revision G]**.	~~concerns and seek remedial action.~~BBC confirmed agreement on this matter following a call on 15 June 2026 where they requested further information be added to the National Grid position statement to reflect the discussion during the meeting.	
~~EIA – Assessment Conclusions~~				
~~3.5.10~~ 3.5.9	Construction effects (periods outside of weekday daytimes)	The assessment provided in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [~~APP-256~~Revision B]** indicates that no significant effects from construction noise or vibration~~, during either the construction or operational phases~~, are expected in the Brentwood Borough Council area. ~~Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole. The Applicant has provided~~	~~The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including~~	~~No~~ t Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**~~ ~~The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.~~ ~~Further detailed~~Specifically with regards to construction ~~noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific~~works during periods outside of weekday daytimes (principally weekends), no significant adverse are expected where, as well as the standard mitigation measures~~, as~~ secured by ~~NV05~~commitment NV01 of **7.2 Outline 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].**~~**Revision G]**, temporal restrictions are put in place at certain key locations to ensure that any exceedance of the relevant threshold does not occur for a duration that would be significant. ~~With regards to evening, weekend, and~~	~~enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.~~ BBC agrees with the principle of securing temporal restrictions on weekend works through the Section 61 process, and agrees that, in principle, significant adverse effects can be avoided at weekend periods by employing temporal restrictions at key locations, such as works close to the noise sensitive receptors around Rayleigh Road, Hutton. However, although BBC acknowledges that the Applicant cannot commit to specific temporal restrictions at this stage, BBC cannot agree that significant adverse effects from construction noise will be avoided during weekend periods (principally works close to the noise sensitive receptors around Rayleigh Road, Hutton) until such restrictions are agreed. ~~BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.~~BBC	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~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~~The applicant concedes that at this stage it is not able to identify specific temporal restrictions beyond those stated in Requirement 7 of **3.1 Draft DCO [Revision G]**. However, the Applicant proposes to identify such restrictions as part of the Main Works Contractor(s) detailed assessment, secured by commitment NV05 of **7.2 Outline Code of Construction Practice [~~REP4-165~~Revision G]**~~)~~, ~~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~~and secure them, along with other monitoring measures and monitoring, through Section 61 applications, through consultation with BBC, prior to construction, secured by commitment NV03 of **7.2 Outline Code of Construction Practice [~~REP4-165~~Revision G]**. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	confirmed this matter is Not agreed following a call on 15 June 2026.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
~~3.5.11~~ 3.5.10	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~~Revision B]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC agrees that the assessment of effects during operation and maintenance presented is considered appropriate.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.11	Draft DCO/ Outline CoCP/ Outline NVMP (weekday daytime periods)	Further detailed construction noise and vibration assessment will be undertaken by the contractor and shared with BBC, and the Noise and Vibration Management Plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Outline Code of Construction Practice [Revision G]**. Best practicable means (BPM) is secured by NV01 of **7.2 Outline Code of Construction Practice [Revision G]**. **Specific Mitigation** 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, such works would be subject to Section 61 agreements through consultation with BBC, as secured by commitment NV03 of **7.2 Outline Code of Construction Practice [Revision G]**. The Section 61 agreement(s) will secure any specific mitigation measures, temporal restrictions, and monitoring.	BBC agrees in principle that the requirements in the Draft DCO, the commitments in the Outline CoCP, and the management principles in the Outline NVMP are sufficient for the avoidance of significant adverse effects during weekday daytime periods. BBC confirmed agreement on this matter following a call on 15 June 2026 where they requested further information be added to the National Grid position statement to reflect the discussion during the meeting.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.5.12	Draft DCO/Outline CoCP/NVMP (periods outside of weekday daytimes)	Further detailed construction noise and vibration assessment will be undertaken by the contractor~~, and the noise and vibration management plan~~ and shared with BBC, and the Noise and Vibration Management Plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Outline Code of Construction Practice [~~REP4-165~~]**~~. The detailed assessment will take account of specific works locations within the LoD~~**Revision G]**. Best practicable means (BPM) is secured by NV01 of **7.2 Outline Code of Construction Practice [~~REP4-165~~]Revision G]**. Specific mitigation. ~~With regards to evening, weekend, and night-time working (where required), construction~~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~~such works would be subject to Section 61 agreements through consultation with BBC, as secured by ~~NV05~~commitment NV03 of **7.2 Outline Code of Construction Practice [~~REP4-165~~])Revision G]**. The Section 61 agreement(s) will secure any specific mitigation measures, temporal restrictions~~may be put in place at specific locations for specific works to ensure significant adverse~~	BBC broadly agree that the requirements in the Draft DCO, the commitments in the Outline CoCP, and the management principles in the Outline NVMP are sufficient for the avoidance of significant adverse effects during periods outside of weekday daytimes in most cases. However, although BBC acknowledges that the Applicant cannot commit to specific temporal restrictions at this stage, BBC cannot agree that significant adverse effects from construction noise will be avoided during weekend periods (principally works close to the noise sensitive receptors around Rayleigh Road, Hutton) until such restrictions are agreed. ~~The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.~~ ~~BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about~~	Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~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]**.~~, and monitoring. ~~The Applicant does not agree that the ES acknowledges that significant adverse noise effects will occur during construction. On the contrary, the ES indicates that significant adverse effects are not expected at any location including in the Brentwood Borough, due to construction noise and vibration.~~ ~~Refer to the Applicant's positions presented 3.5.7 above.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	~~the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.~~BBC confirmed this matter is Not agreed following a call on 15 June 2026.	
~~**Other matters as required**~~				

3.6 Health and Wellbeing

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and	The policy context, legislation and guidance	BBC agrees that the relevant legislation, policy	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	legislation	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~~Revision B]** and Section 10.2 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	and guidance has been identified and appropriately considered to inform the assessment.	
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.	BBC agrees with the study area.	Agreed
3.6.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]**.	BBC agrees that sufficient desktop data has been collected to inform the assessment as presented.	Agreed
3.6.4	Assessment methodology	A meeting was held on 24 September 2024 to agree the assessment methodology of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]** The Methodology was also agreed through the Health and Wellbeing Refreshed Approach – Technical Note issued in October 2024.	BBC agrees with the assessment methodology.	Agreed
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]**.	BBC agrees that the key parameters and assumptions presented are considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		The key parameters and assumptions presented are considered appropriate.		
EIA – Baseline Conditions				
3.6.6a	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 [Revision C].** The baseline conditions and receptors presented are considered appropriate. The approach to identifying vulnerable groups (including individuals with protected characteristics, which include those with various types of disability or health need) has been set out in paragraph 10.4.19 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C].**	BBC considers that subject to having reached agreement on the noise safeguards established in 3.5.9, 3.5.11 and 3.5.12, as well as the proper identification of vulnerable people/groups/receptors affected by the construction of the infrastructure, that the baseline conditions and receptors are considered appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation				
~~3.6.6~~3. 6.6b	~~Baseline conditions, receptors and mitigation (embedded, standard, additional)~~Mitigation	~~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.~~ Mitigation relevant to health and wellbeing is summarised in Section 10.6 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C].** Additional commitments have been made in relation to communication and engagement	BBC ~~is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment~~	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		with communities during the pre-commencement and construction phases, as a way to help manage community stress and anxiety. These include commitments GG36 and GG37 in **7.2 Outline Code of Construction Practice [Revision G]** which relate to the preparation of a detailed Communications Strategy (GG36) and the importance of a robust and accessible complaints procedure (GG37). The detailed Communications Strategy will include information about how the Applicant will engage populations in sensitive locations (including with seldom heard and hard-to reach groups). The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday to – Friday: 07:00 to 19:00 • Saturday, Sunday and Bank Holidays / Public Holidays: 07:00 to 17:00 Saturdays, Sundays and Bank Holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [~~APP-130~~Revision B]**. The working hours are secured through Requirement 7 of Schedule 3 of the **3.1 Draft ~~Development Consent Order [REP4-03]~~** (draft DCO~~)~~	~~with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.~~acknowledges that the Project covers a length of more than 180km and as a largely linear Project will not be occurring along its entire length for its entire duration, but rather be characterised by periods of higher and lower intensity, as yet to be determined. BBC therefore considers that subject to having reached agreement on the noise safeguards established in 3.5.9, 3.5.11 and 3.5.12, as well as the proper identification of vulnerable people/groups/receptors affected by the construction of the infrastructure, in addition to the commitment to a Communication Strategy and a robust and accessible complaints procedure that functions properly and is accessible to all in the communities affected by the Project and the occasional controlled working on weekends and public holidays to provide working flexibility, that the mitigation is considered appropriate.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		[Revision G]. ~~The assessment within the ES (Volume 6 of the DCO application) is based on a set of parameters which includes the core working hours for the construction phase of the Project.~~ ~~The Noise and Vibration assessment **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that, with the embedded mitigation and controls set out in the **7.2 Outline Code of Construction Practice, [REP4-164],** significant effects from noise and vibration during the construction phase are not anticipated. The measures set out within the **7.2 Outline Code of Construction Practice [REP4-164]** will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 the **draft DCO [REP4-037]** within the final CoCP.~~ ~~The Traffic and Transport assessment **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the impact of construction traffic on sensitive receptors. The assessment concluded that, with the embedded mitigation and controls set out in the **7.3 Outline Construction Traffic Management Plan [REP4-174]** (Outline CTMP), significant effects are not anticipated. The measures set within the Outline CTMP will be secured~~		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~via Requirement 4(1)(b) (Construction Management Plans) of **3.1 draft DCO [REP4-037]** the draft DCO within the final CTMP.~~ ~~For further context, the construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather, there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.~~ The defined core working hours provide essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and public holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. Any blanket restrictions on weekend and public holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop start working, and a longer overall construction period, which would itself result in greater long term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO controls to manage impacts included in Table 6.1 of the **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**, including controls on ~~nuisance generating~~nuisance generating		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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). The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather, there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. Further information relating to the approach to noise mitigation is set out in Matter ID3.5.7. The Applicant concedes that the mitigation presented at ES stage is outline and the outcomes are dependent upon further work by the contractor, through consultation with BBC, particularly at a small number of key locations. However, it demonstrates that significant adverse effects can, in principle, be avoided. ~~Refer to Table 4.14 ID 6.45, 6.46 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] for further~~		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~information.~~Commitments regarding further detailed construction noise and vibration assessments by the contractor, associated determination of specific mitigation measures, monitoring, and Section 61 agreements, and which are of relevance to the health and wellbeing topics, are described in further detail in relation to Matter ID 3.5.11.		
EIA – Assessment Conclusions				
3.6.7	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]**. The assessment of effects during construction presented is considered appropriate. Paragraph 10.4.28 in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [~~APP-192~~Revision C]** notes as part of the limitations of the assessment that health effects are considered at a population, rather than an individual level. Whilst it is acknowledged that there are individuals along the Project route with different health needs and vulnerabilities, effects are presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant for particular effects. This population-based approach is consistent with health impact assessment methodologies and is proportionate and appropriate for a project of this scale and nature. ~~The approach to identifying vulnerable groups~~	BBC ~~is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity~~considers that subject to having reached agreement on the noise safeguards established in 3.5.9, 3.5.11 and 3.5.12, as well as the proper identification of vulnerable people/groups/receptors affected by the construction of the infrastructure, that the construction effects and the mechanisms for controlling them as set out are considered	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~(including individuals with protected characteristics, which include those with various types of disability or health need) has been set out in paragraph 10.4.19 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192].**~~ The assessment within the ES (Volume 6 of the DCO application) is based on a set of parameters which includes the core working hours for the construction phase of the Project. Impacts to sensitive receptors during the construction phase are assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The assessment concluded that, with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice, [Revision G],** significant effects from noise and vibration during the construction phase are not anticipated. Measures set out in **7.2 Outline Code of Construction Practice [Revision G]** will be secured via Requirement 4(1)(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [Revision G]** within the final CoCP. The impacts of construction traffic on sensitive receptors are assessed in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B**]. The assessment concluded that, with the embedded mitigation and controls set out in **7.3 Outline Construction Traffic Management Plan [Revision F]**, significant	appropriate and Agreed.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		effects are not anticipated. The measures set within **7.3 Outline Construction Traffic Management Plan [Revision F]** will be secured via Requirement 4(1)(b) (Construction Management Plans) of **3.1 Draft Development Consent Order [Revision G]** within the final CTMP. ~~See response to ID 3.6.6 in relation to mitigation relating to noise and vibration.~~See also response to Matter ID3.5.9 (Construction effects (periods outside of weekday daytimes)).		
3.6.8	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~~Revision C]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC agrees that the assessment of effects during operation and maintenance presented is considered appropriate.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.9	Outline CoCP	~~The~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [~~APP-192~~Revision C]** and is appropriate for managing construction impacts from the Project. ~~Meeting held on 9th October to agree on the structure for the **7.2 Outline Code of Construction Practice [REP4-164]**. A further meeting was held on 29th January 2025 to address comments from stakeholders.~~	BBC ~~is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests~~	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		See response to ID ~~3.6.6~~3.6.6b.	~~that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity~~agrees that the oCoCP includes all relevant mitigation measures that are appropriate for managing construction impacts from the Project.	
~~**Other matters as required**~~				

3.7 Historic Environment

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation (Archaeology)	The policy context, legislation and guidance considered when undertaking the Historic **Environment assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126] and Section 11.2 of 6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~REP6-059]** **All relevant legislation**, policy and guidance has been identified and appropriately considered to inform the assessment. Refer to Table 4.16 ID 6.21, 6.49-50, 6.51,	BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		6.52 **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] for further information.**		
3.7.2	Policy and legislation (Built Heritage)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 11.2 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant notes the LPAs request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with ~~the Scoping Report (~~**6.19 Scoping Report [APP-288 – APP-296]**~~)~~, ~~Scoping Opinion (~~**6.20 Scoping Opinion [APP-297]**~~)~~ and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [~~AS-068~~Revision D]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of	BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment and 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]**, relevant policy regarding impacts to NDHA has also been complied with.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/ significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.		
EIA – Approach and Methods				
3.7.3	Study area	The study area was agreed through ~~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 thematic group meetings where further comments were addressed.	BBC agrees with the study area identified.	Agreed
3.7.4	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as	BBC agrees that sufficient desktop and survey data for Built Heritage has been collected to inform	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	(Built Heritage)	presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D].** Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. ~~The~~ **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [~~APP-209~~Revision C]** is organised geographically and by period and includes baseline information on non-designated historic buildings.	the assessment as presented.	
3.7.5	Data sources (Archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D].**	BBC agrees that sufficient desktop data for Archaeology has been collected to inform the assessment as presented.	Agreed
3.7.6	Data sources (Archaeology) - Survey data	Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the **Supplementary Environmental Information [AS-068 to AS-083].** This represents a combined total of 74% of the	BBC ~~maintains that the fieldwork proposed prior to application has not yet been completed and the impact of this to inform the assessment remains under review. This matter therefore remains under discussion and review and also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to Agreed~~agrees that the walkover surveys,	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		overall geophysical survey area and the area of intrusive impact for the Project. ~~It is intended to submit the report~~The results of the phase 2 geophysics that has been completed up to the 17 April 2026 was submitted into Deadline 6 (7.7.26) of the Examination ES Appendix 11.8. 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. 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	geophysical surveys and archaeological trial trenching undertaken is sufficient.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		ongoing engagement between the parties, this matter can be moved to Agreed.		
3.7.7	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. ~~The~~ **6.20 Scoping Opinion [APP-297]** stated: '*The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.*' The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and November 2024. BBC comments noted and Historic Environment Viewpoints feedback has been taken into account for the assessment. The Applicant's position regarding non-designated heritage assets is as outlined in Section 3.6.1 (Policy and Legislation) above.	BBC ~~agrees~~acknowledges that the methodology for assessing Historic Environment has been agreed through the Scoping Opinion and discussed at Thematic Group Meetings, but continues to highlight the section of the proposed route at Ingatestone Hall within close proximity to Heron Hall as being one of particular historic sensitivity. The preferred route as proposed will pose a significant impact on the setting of these listed buildings and potentially have a direct impact ~~for~~on significant Ancient Monuments and archaeological deposits. BBC has therefore stressed the importance of a full assessment of the impact of the proposal on the historic, architectural, and in particular the associative value of these heritage assets (above and below ground), as well as all other affected heritage assets across the route. On this matter, BBC request NGET to seek detailed advice with the regional team at Historic England.	Agreed
3.7.8	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.	BBC agrees that the methodology for assessing Historic Environment has been agreed as set out.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.7.9	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. The key parameters and assumptions presented are considered appropriate.	BBC agrees that key parameters and assumptions presented are considered appropriate.	Agreed
3.7.10	Key parameters and assumptions (Archaeology)	The fieldwork undertaken to date (see response to 3.7.6) comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to 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~~Revision D]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [~~APP-210~~Revision D]** 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	BBC ~~supports the ECC position that until the completion of intrusive field evaluation, there is not agreement with the statement under 11.4.33 that "*The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.*" This matter remains under discussion and review also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move this matter to Agreed~~agrees that for archaeology the fieldwork undertaken to date to satisfy the key parameters and assumptions is sufficient.	~~Under Discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		in place through Requirement 5 of **3.1 Draft ~~Development Consent Order [REP4-037~~DCO [Revision G]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [~~APP-328~~Revision C]** 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~~Revision D]** 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.		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		including HE, ECC, SCC and NCC. 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~~Revision C]** with the intention that any further comments can be addressed and included for submission at Deadline 5. The evaluation of the ~~400kV~~400 kV underground cable is complete and reporting for the final areas completed in 2026 is underway. No significant areas of archaeology have been identified that were not already included in baseline and assessment. Matter remains under discussion for archaeology.		
~~3.7.14 a~~3.7.14 a	Standard mitigation (Built Heritage H06)	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~~Revision D]** and set out in ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** the standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to	BBC agrees that the standard mitigation is considered appropriate and adequate in terms of its nature and scale to address potential effects. BBC also agrees with commitment H06 and the understanding of the term 'appropriate'.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management Plan [~~REP3-030~~Revision G].** Specifically, this means: Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.		
~~3.7.14 b~~3.7.1	Standard mitigation	Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and**	BBC ~~supports the ECC position on this issue In that whilst we understand that the anticipated~~	~~Under discussion~~Ag

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
4 b	(Built Heritage H07)	**Vibration [~~APP-256~~Revision B]** did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate. Further details regarding construction vibration effects on listed buildings have been provided in response to ExQ1 HE 1.11 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318].** As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [~~APP-305~~Revision D]** a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. In addition, **7.2 Outline Code of**	~~effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling), we would still recommend expansion of H07 to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects~~agrees that the standard mitigation is considered appropriate and adequate in terms of its nature and scale to address potential effects, subject to the function and effectiveness of the contact mechanism for vibration affecting built heritage assets both identified and unidentified.	reed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Construction Practice [~~REP4-164~~Revision G], commitment GG30 includes: *"A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken."* The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
3.7.15	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]** and set out in **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that standard mitigation is considered appropriate and adequate in terms of its nature and scale to address potential effects.	Agreed
3.7.16	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address	BBC ~~supports the ECC position~~agrees that 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~~measures are considered appropriate	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		potential effects. April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project to the Archaeology Working Group including HE, ECC, SCC and NCC. 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~~Revision C]** with the intention that any further comments can be addressed and included for submission at Deadline 5.	and adequate in terms of their nature and scale to address potential effects.	
EIA – Assessment Conclusions				
3.7.17	Construction effects (Built Heritage)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. The assessment of effects during construction presented is considered appropriate.	BBC agrees that the assessment of effects on Built Heritage during construction presented is considered appropriate.	Agreed
3.7.18	Construction effects (Archaeology)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. The assessment of effects during construction presented is	BBC agrees that the assessment of effects on Archaeology during construction presented is considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		considered appropriate.		
3.7.19	Operational (and maintenance) effects (Built Heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. The assessment of effects during operation (and maintenance) presented is considered appropriate. NG have considered the positioning of this pylon through the design process and have avoided placing pylons in one of the intentional view corridors from the Grade II listed Church of St Mary and Dunton Hall. However, other constraints have meant it has not been possible to reposition pylons out of all view corridors. Historic England have been consulted on all elements of the Project design, however they have not commented on Grade II listed buildings as this falls under the remit of the Local Planning Authorities. Due to the level of expected harm and in line with current policy, NG are unable to accommodate moving the position of this pylon without creating direct effects to the development footprint or moving closer to other heritage assets.	BBC agrees with the assessment of effects for Built Heritage during operation and maintenance presented is considered appropriate. However, in support of comments made at 3.7.7, BBC would urge the Applicant to seek solutions for the impacts on the cluster of listed buildings around Ingatestone Hall within close proximity to Heron Hall, one the authority considers to be one of particular historic sensitivity, including its wider landscape setting and the associative value of the collective of these heritage assets.	Agreed
3.7.20	Operational (and maintenance) effects (Archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]**. The assessment of	BBC agrees that the assessment of effects for Archaeology during operation and maintenance presented is considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		effects during operation (and maintenance) presented is considered appropriate.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.21	Outline CoCP	~~The~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11 - Historic Environment [~~AS-068~~Revision D]** and is appropriate for managing construction impacts from the Project. ~~Meeting held on 9th October to agree on the structure for the **7.2 Outline Code of Construction Practice [REP4-164].**~~ ~~A further meeting was held on 29th January 2025 to address comments from stakeholders.~~ See 3.6.14 and 3.6.15 for current position. The CoCP was updated following comments received in LIRs and Written Representations.	BBC agrees that with new wording following comments in LIRs and Written Representations, that the OCoCP is appropriate for managing relevant construction impacts from the project.	Agreed
Other matters as required				
3.7.22	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.	BBC agrees that the scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.7.23	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.	BBC agrees that the scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.24	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~~Revision C]** is considered appropriate and proportionate to the level of evaluation required. April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project to the Archaeology Working Group including HE, ECC, SCC and NCC. 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~~REP5-161]** which was submitted at Deadline 5.	EPS, on behalf of BBC ~~supports the ECC position on this issue that the Outline AMS-WSI is currently not agreed. This matter remains under discussion and review and also in light of the recently provided N2T ET Geoarchaeological WSI, for which the detail once reviewed may help move~~, confirmed their agreement on this matter ~~to Agreed~~on 14th July 2026.	~~Under discussion~~Agreed
3.7.25	Programme for completion of archaeological	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was	BBC agrees that the programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

3.8 Landscape and Visual

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment (LVIA) is presented in **6.2 Environmental Statement Chapter 2 -**	~~BBC supports the current ECC position on this issue.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC agrees	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Key Legislation and Planning Policy Context [~~APP-126~~Revision B] and Section 13.2 of **Chapter 13** (**Landscape and Visual**) **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B].** All relevant legislation, policy and guidance ~~haves~~has been identified and appropriately considered to inform the assessment. The Applicant notes that this matter can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ~~ECC~~EPS on ~~20th~~20 May 2026.	that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	
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.	BBC agrees ~~with~~that the study area for assessing Landscape and Visual ~~that was~~has been agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.	Agreed
3.8.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B].** ~~As per the response given to ECC:~~ ~~The request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints**~~	~~BBC supports the current ECC position on this issue.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC agrees that sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~[APP-243] was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have reduced legibility of the figure. Each LVIA visualisation in **7.12 Visualisations [APP-343 to APP-351]** is accompanied by a location map on 1:25,000 OS mapping with the field of view also indicated on the figure. The viewpoint assessment in Annex a of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]** is accompanied by 1:25,000 OS mapping and aerial imagery.~~ The Applicant suggests that the study area ~~apart from those within the context of the~~(excluding viewpoints) can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ~~ECC~~EPS on ~~20th~~20 May 2026.		
~~3.8.4~~3.8.4a	Assessment methodology (including LVIA methodology)	The outline methodology for assessing Landscape and Visual was agreed through ~~the~~ **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic workshops The LVIA methodology is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [~~APP-227~~Revision B]**. ~~A meeting was held on the 25 September~~	~~The~~BBC agrees that the outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate~~and~~, as well as 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 28th November 2024 to follow up any additional changes to the assessment.~~ ~~BBC provided comments on the proposed viewpoints in Essex South in an E-mail on 25th~~	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~2024 to seek to agree the detailed methodology. A further meeting was held on 28th November 2024 to follow up any additional changes to the assessment.~~ ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.~~ The Applicant suggests that the matter of the assessment methodology ~~apart from those within the context of the~~(excluding viewpoints) can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ~~ECC~~EPS on ~~20th~~20 May 2026. The Applicant has responded on Viewpoints under ID 3.8.4b.	~~October 2025. Viewpoints are still under discussion.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~	
~~3.8.5~~3. 8.4b	LVIA Viewpoints	The LVIA is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232].** Visualisations are provided in **7.12 Visualisations [APP-343 to APP-351, REP4-180 to REP4-182].** The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and**	~~The Applicant welcomes ongoing engagement with~~ BBC considers that the number of viewpoints assessed in ~~relation to~~the LVIA is proportionate and acknowledges the further 47 viewpoints and visualisations supporting the historic environment assessment. However, BBC does not consider that the outputs of these viewpoints has properly captured the impacts on either landscape or historic environment. This is particularly the case for the cluster of listed buildings around Ingatestone Hall but also the special landscape setting of this cluster, which enhances its value.	Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Assessment - Part 1 of 4 [APP-229]. The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the **Statements of Common Ground (5.9.1 to 5.9.12 [latest versions at Revision D or E as relevant]**). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [Revision D]**. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in **7.12 Visualisations Part 8 [APP-350] and Part 9 [Revision C]**. The Applicant does not consider that further viewpoints are necessary. The existing suite provides robust and sufficient coverage to understand the likely significant effects of the Project, including within valued landscapes. The LVIA is not reliant solely on fixed viewpoints, but is underpinned by extensive fieldwork and professional assessment across the wider	BBC does not consider that the viewpoints or visualisations for this part of the Borough have assisted in capturing the extent of anticipated impacts. BBC therefore does not agree with this matter. ~~Should it be considered~~	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		study area. Additional viewpoints in close proximity or with similar orientation would be unlikely to materially alter the assessment findings or conclusions. Accordingly, the Applicant considers that the assessment is robust, proportionate and compliant with best practice, and that the current viewpoint coverage is sufficient to inform the Examination. Matters relating to the historic environment assessment are considered in Table 3.7 and the Applicant notes that all matters are agreed. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the ~~Landscape and Visual Impact Assessment~~LVIA are summarised in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B]**. The key parameters and assumptions presented are considered appropriate.	BBC agrees that ~~respective positions remain unchanged following further discussion, it may be~~the key parameters and assumptions associated with the LVIA are considered appropriate~~ to record this matter as 'not agreed'The ES acknowledges significant adverse effects within 0.5 km of the overhead line, but the Council considers that major adverse impacts will extend up to 1 km and moderate adverse effects up to 1.5 km, particularly in open, semi-enclosed landscapes such as the Brentwood Hills and Dunton Settled Claylands. Even beyond these distances, the cumulative effect of multiple pylons and the continuous overhead linear character of the project will industrialise rural landscapes and erode scenic~~	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			~~beauty, tranquillity, and sense of place, contrary to GLVIA3 guidance and National Policy Statement EN-1 (paras 4.3.4 and 5.10.6).~~ ~~Key concerns:~~ ~~• LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km.~~ ~~• LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community.~~ ~~• VRA G1 Ingatestone & Fryerning – significant adverse effects on PRoW (St Peter's Way) and heritage settings.~~ ~~• VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village.~~ ~~BBC objects to the proposed overhead line alignment within its administrative area due to unacceptable landscape and visual harm, incompatibility with strategic growth objectives, and failure to comply with EN-1 policy requirements. The Council seeks undergrounding in sensitive areas and a strategic compensation package as a minimum. The Council requests that the Examining Authority secure enforceable requirements within the DCO for undergrounding in sensitive locations (particularly Brentwood Hills and DHGV) and a strategic landscape compensation package to offset residual harm.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged~~.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			~~Under discussion~~	
EIA – Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B]**. The baseline conditions and receptors presented are considered appropriate. ~~The Applicant has provided responses to concerns raised in Appendix F of **8.4.1 Applicant's Comments on Relevant Representations** and also in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~ ~~Section 3.8 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicants response to concerns related to the Project and proposed Dunton Hills Garden Village.~~ ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.~~	~~The ES acknowledges significant adverse effects within 0.5 km of the overhead line, but the Council considers that major adverse impacts will extend up to 1 km and moderate adverse effects up to 1.5 km, particularly in open, semi-enclosed landscapes such as the Brentwood Hills and Dunton Settled Claylands. Even beyond these distances, the cumulative effect of multiple pylons and the continuous overhead linear character of the project will industrialise rural landscapes and erode scenic beauty, tranquillity, and sense of place, contrary to GLVIA3 guidance and National Policy Statement EN-1 (paras 4.3.4 and 5.10.6).~~ ~~Key concerns:~~ ~~• LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km.~~ ~~• LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community.~~ ~~• VRA G1 Ingatestone & Fryerning – significant adverse effects on PRoW (St Peter's Way) and heritage settings.~~ ~~• VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village.~~ ~~BBC objects to the proposed overhead line~~	~~Under discussion~~Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			~~alignment within its administrative area due to unacceptable landscape and visual harm, incompatibility with strategic growth objectives, and failure to comply with EN-1 policy requirements. The Council seeks undergrounding in sensitive areas and a strategic compensation package as a minimum. The Council requests that the Examining Authority secure enforceable requirements within the DCO for undergrounding in sensitive locations (particularly Brentwood Hills and DHGV) and a strategic landscape compensation package to offset residual harm.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC agrees that the baseline conditions and receptors for Landscape and Visual are considered appropriate.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded ~~mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**~~ Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [~~APP-130~~Revision B]** 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~~Revision B]**. Embedded	~~BBC Statutory Consultation response:~~ BBC considers that more could have been done by way of embedded mitigation to address its longstanding concerns on Landscape and Visual impact within the authority area. The proposed routing of the overhead line to the northern, western and southern boundary of Haverings Grove serves to create a harmful severing effect, acting as an imposing physical barrier on the landscape between this settlement and Hutton. ~~BBC wish to highlight~~Despite the opportunities for the Norwich to Tilbury project to facilitate the removal of the 132kV pylon line, running to the west of Haverings Grove, operated by UK Power Networks (UKPN), to reduce the	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		mitigation is considered appropriate ~~and adequate, in terms of its nature and scale,~~ proportionate and robust to address potential effects. Embedded mitigation measures include the undergrounding of part of an existing 132 kV overhead line west and south of Havering's Grove and east of Dunton Hills Farm, as well as the 3:1 tree replacement for individual trees where this occurs within the Order Limits. As described in the **5.15 Design Development Report [APP-119]** (from page 114 onwards) it is the Applicant's view that adopting the alignment of the existing 132 kV overhead line (by placing this section of the 132kV underground and using the vacant corridor for the 400kV alignment) from the north of Bushwood Farm and across the A129 would not be appropriate. This alignment, if used for the 400 kV connection, would cross the grounds of a school and require additional tree removal and management to create the necessary cleared corridor for a 400 kV alignment. It is however proposed to replace a 2 km section of the 132 kV overhead line from north of Bushwood Farm to south of Creasey's Farm with underground cable. ~~Modification~~Modifications to the 400kV arrangement were also made following the Statutory Consultation.	overall cumulative visual impact of energy infrastructure in this location, BBC has consistently highlighted the unacceptable impacts of overhead lines in this location and the need for serious consideration of re-routing or undergrounding of the route around Haverings Grove. BBC therefore considers that this matter is Not Agreed. ~~Notwithstanding the above, the Council considers that there are opportunities for the Norwich to Tilbury project to facilitate the removal of the 132kV pylon line, running to the west of Haverings Grove, operated by UK Power Networks (UKPN), to reduce the cumulative visual impact of energy infrastructure in this location and, to some extent, compensating for the additional visual impact of the new Norwich to Tilbury 400kV power lines. The Council recognises, and expects, that this will require effective collaboration between NGET, UKPN and Ofgem.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		The modification occurs southwards from the A129 and changed the angle pylon to a suspension to move the pylons and the alignment further to the south of Havering's Grove to reduce effects. ~~The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.8	Standard mitigation	~~Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **Chapter 13 (Landscape and Visual) [APP-226]** and set out in the **7.2 Outline Code of Construction Practice [REP4-164]**~~ 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.	~~BBC supports the current ECC position on this issue.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC considers that the standard mitigation measures do not address or reduce significant Landscape and Visual impacts and that the lack of detail and clarity at this stage is deemed too vague for a project of this scale and impact. BBC therefore considers that this matter is Not Agreed.	~~Under discussion~~ Not agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough 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~~Revision B]** and ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**. The standard mitigation is considered appropriate ~~and adequate, in terms of its nature and scale,~~, proportionate and robust to address potential effects. It is not considered reasonable or possible for standard mitigation measures to wholly mitigate significant temporary impacts of 400 kV infrastructure during construction. ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures ~~are presented in Section 13.6 of **6.13 Environmental Statement Chapter**~~	~~BBC supports the current ECC position on this issue.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC considers that the additional mitigation measures fail to address the Landscape and Visual impacts	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~13 - Landscape and Visual) [APP-226].~~ ~~Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The consideration of additional mitigation measures are~~is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226].~~ ~~Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~Revision B].** The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** ~~sets out~~and the Applicant's ~~approach to the mitigation hierarchy for the Project.~~position on landscape mitigation is set out in Section 3.10 and most recently in Section 5.1a of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118].** ~~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].**~~ ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be~~	and that additional mitigation is needed to address the negative impacts on landscape character, tree and hedgerow losses and visual amenity impacts. BBC therefore considers that this matter is Not Agreed.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~appropriate to record this matter as 'not agreed'.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.9a	Compensation	The Applicant's position in relation to the policy requirement for landscape and visual compensation remains unchanged from that set out at ISH 2 and detailed in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and most recently set out in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. Without prejudice to this position, the Applicant has however provided details of landscape and visual compensation measures in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** and will provide a mechanism to secure such measures should the Secretary of State consider them to be necessary and meet the relevant legal tests. ECC/BBC queries in relation to the 3:1 replanting commitment for individual trees are addressed where possible within **6.28 Outline Offsite Planting Delivery Scheme (OPDS) [REP6-128]** with further detail to be provided within the final OPDS. The Applicant's response to monitoring and	BBC supports ECC concerns on compensation, particularly on: • = The need for a development of this scale to have a comprehensive, detailed and deliverable compensation scheme; • = The lack of clarity and detail on compensation planting; • = The numerous outstanding issues concerning baseline information and practical replacement on the 3-1 replacement tree planting, as well as remaining queries on species selection, ownership/management/maintenance, location and alternative compensation; • = The general lack of clarity on the position and interrelationship of mitigation and compensation, as well as on the off-site compensation currently being negotiated between the applicant and ECC; and • = The time frames for the management and maintenance of replacement planting. BBC therefore considers that this matter is Not Agreed.	Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		aftercare is set out in **8.5.12 Applicant's Written Summary of Oral Submissions and Responses to Action Points for Issue Specific Hearing 4 [REP6-118].** National Grid has committed to a five-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for development consent projects of this scale. This is further strengthened by embedded commitments to high-quality planting specifications, ongoing monitoring, and adaptive management, including replacement of failed planting where necessary, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA – Assessment Conclusions				
3.8.10	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~~Revision B].** The assessment of effects during construction presented is considered appropriate. With regard to vegetation loss, the assessment is based on the vegetation clearance	BBC supports the ~~current~~ ECC position on this ~~issue.~~ matter that the assessment of effects has not meaningfully quantified in Landscape and Visual terms potential tree and hedgerow loss along the route and therefore BBC considers that this matter is Not Agreed. ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** and presented on **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [REP4-029].** **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]** details trees to be removed and those considered to be affected /managed based on the current alignment and impacts on hedgerows are quantified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Impacts on trees and hedgerows are also visually represented on **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [Revision B].** ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Further detail on vegetation loss within each LCA or LCT will be provided by the Applicant.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.11	Operational (and maintenance)	The approach to the LVIA follows professional guidance as set out in **6.13.A1**	~~BBC supports the current ECC position on this issue.~~	~~Under discussion~~ No

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
	effects	**Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]** and was shared and discussed with stakeholders. The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B]** and also **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [Revision B]** and illustrative materials on **Figures 13.1 to 13.19 of the ES (6.13.F1 [REP5-136], 6.13.F2 to 6.13.F5 [APP-238 to APP-241], 6.13.F6 [REP5-137], 6.13.F7 [Revision D], 6.13.F8 to 6.13.F19 [APP-244 to APP-255]**). The assessment team, which includes highly experienced Chartered Members of the Landscape Institute, has thoroughly explored potential effects on landscape character and visual amenity out to 3 km from the Project, and their findings and judgements are set out in an objective and consistent manner. It is considered that the judgements made remain fair and reasonable and that no changes need to be made. The matter of compensation has been addressed in ID 3.8.9a, compensation by definition would not reduce the adverse effects resulting from the Project.	~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC supports the ECC position that recognises the significant negative Landscape and Visual impact at both construction and operational stages of the project and the view that no substantive proposals for off-setting or compensation to deal with this have been put forward. BBC therefore considers that this matter is Not Agreed.	t Agreed

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~The assessment of effects during operation (and maintenance) is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** The assessment of effects during operation (and maintenance) presented is considered appropriate.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	~~The~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B]** and is appropriate for managing construction impacts from the Project. Commitments are in place to reduce the impact to trees and hedgerows during detailed design. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within **7.2 Outline Code of Construction Practice [Revision G]**.	~~BBC supports the current ECC position on this issue.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC supports the concerns of ECC on this matter on construction routes and alignment without detailed site analysis of the existing landscape and its features, and on replacement planting and its proper establishment within acceptable time frames. BBC therefore considers this matter is Not Agreed.	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		At detailed design the Main Works Contractor(s) would seek to retain trees and hedgerows as per commitment B08 in **7.2 Outline Code of Construction Practice [Revision G]**. Measures to avoid/mitigate impacts to all trees (including veterans) are also Project commitments in LV04 and LV05 in **7.2 Outline Code of Construction Practice [Revision G]**. ~~Meeting held on 9th October 2024 to agree on the structure for the **7.2 Outline Code of Construction Practice [REP4-164]**. A further meeting was held on 29th January 2025 to address comments from stakeholders.~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.13	Outline LEMP	~~The~~ **7.4 Outline Landscape and Ecological Management Plan [~~REP3-030~~Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [~~APP-226~~Revision B]** and is appropriate. ~~The Applicant confirms that the Environmental Areas provide landscape and visual mitigation and will be managed for BNG for 30 years.~~ In response to ExQ1 BIO 1.41 the	BBC ~~email on 23rd October 2024 regarding the draft outline LEMP~~supports ECC concerns on this matter, in particular: • Definition, scope and scale of the term 'compensation'; • Unresolved issue of off-site compensation, including on location, land ownership and detailed suitability of what could be achieved; • Lack of clarity between compensation and mitigation/BNG obligations, with the use of geo-located planting plans and habitat creation evidence central to providing clarity; and	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Applicant set out clearly the different measures provided by the Project and different categories they fell within in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. This clearly set out the measures provided for mitigation, compensation and BNG. ~~Section 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the approach for 3:1 replacement planting for individual trees and small groups~~The Applicant has provided details in relation to the replanting of individual trees offsite within 8.28 Outline Offsite Planting Delivery Scheme [REP6-128. The Applicant considers that the delivery of on-site (within the Order Limits) reinstatement planting comprises reinstatement/ mitigation, but the delivery of off-site (outside the Order Limits) planting under the 3:1 commitment would comprise compensation. ~~A five-year adaptive aftercare period for replacement planting outside Environmental Areas is proposed.~~ The Applicant has also provided responses to concerns raised related to aftercare of replacement planting and mitigation within Environmental Areas in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and more recently in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to**	• = Support for additional mitigation and compensation measures, including enhanced planting schemes in key locations and landscape-scale GI interventions. ~~BBC noted that clarity is needed on the differences between Mitigation Areas, Environmental Areas, Landscape and Visual Mitigation.~~ ~~BBC noted that discussion is needed on how long replacement planting, landscape and visual mitigation and compensatory planting will be cared for.~~ ~~BCC noted that the Councils would want to see an ongoing role/consultation in the monitoring of any replacement, mitigation or compensatory planting to ensure long term success.~~ ~~Following a meeting held in January 2026, their position on this matter is unchanged.~~BBC therefore considers that this matter is Not Agreed.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Action Points for Issue Specific Hearing 4 [REP6-118] in response to Item No.5.1q. The Applicant's position on landscape compensation is set out under ID 3.8.9a. Engagement with ECC on behalf of BCC is continuing in relation to refining the landscape and visual compensation offer. ~~Meeting held on 9th October to agree on the structure for the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. A further meeting was held on 29th January 2025 to address comments from stakeholders.~~ ~~Comments received from EPS were taken on board and addressed in the following iteration of the **7.4 Outline Landscape and Ecological Management Plan [REP3-030].**~~ ~~The Applicant welcomes ongoing engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'~~The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
~~**Other matters as required**~~				

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

3.9 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	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~~Revision B]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 ~~(~~- Socio-economics~~,~~ Recreation and Tourism~~)~~ [~~APP-265~~Revision C]** ~~of the ES~~. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed
EIA – Approach and Methods				
3.9.2	Study area	~~The~~ **6.20 Scoping Opinion [APP-297]** stated: *"The Applicant should seek to agree the study area with the relevant local authorities".* A meeting was held on ~~14th~~14 November 2024 to seek to agree this point in ~~the~~ **6.20 Scoping Opinion [APP-297]**.	BBC agrees with the study area.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Technical Notes were shared in June 2023 and April 2024. Following the meeting held on ~~14th~~14 November, it was agreed that the study area for businesses would be expanded from 1 km to 3 km to take into account potential visual effects on businesses. The 3rd technical note was issued to BBC on ~~28th~~28 March 2025 to seek to agree on the study area and methodology.		
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~~Revision C]**.	BBC agrees that sufficient desktop and survey data has been collected to inform the assessment as presented.	Agreed
3.9.4	Assessment methodology	~~The~~ **6.20 Scoping Opinion [APP-297]** stated *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".* A meeting was held on ~~14th~~14 November 2024 to seek to agree this point in the Scoping Opinion. A 3rd Technical Note was prepared to seek to agree the study area and methodology, therefore this area is still under discussion. The 3rd technical note was issued to BBC on ~~28th~~28 March 2025 to seek to agree on the study area and methodology. The Applicant welcomes ongoing	BBC agrees with the assessment methodology.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		engagement with BBC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to record this matter as 'not agreed'		
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~~Revision C]**. The key parameters and assumptions presented are considered appropriate. BBC comments are noted, and National Grid will continue to engage with BBC on this matter. The scale of construction employment arising from the Project is modest~~, as set out in ID 3.9.3~~. Regional employment and skills analysis are set out in Paragraph 15.5.8 to 15.5.15 of ~~the~~ **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism~~,~~ [~~APP-265~~Revision C]**.Notwithstanding this, the Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive	BBC agrees with the key parameters and assumptions and welcomes the Outline Employment and Skills Plan that will be developed to address employment, skills, training and supply chain matters relevant to the Project, but BBC would also urge NG to maintain clear communication on how wider community benefit funds will be implemented locally and also provide further detail when it becomes available on the Government's proposed electricity bill discount scheme ~~as this becomes available.~~	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. To elaborate on what the Applicant said in response to Relevant Representations [REP2-023] and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the host authorities and has submitted **8.13 Outline Employment and Skills Plan [~~Revision A~~REP5-215]** 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.		
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~~Revision C]**. The baseline conditions and receptors presented are considered appropriate.	BBC agrees that the baseline conditions and receptors presented are considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
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~~Revision C]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed
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~~Revision C]** and set out in ~~the~~ **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed
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~~Revision C]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale,	BBC agrees that additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		to address potential effects.		
EIA – Assessment Conclusions				
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~~Revision C].** The assessment of effects during construction presented is considered appropriate.	BBC agrees that the assessment of effects during construction presented is considered appropriate.	Agreed
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~~Revision C].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC agrees that the assessment of effects during operation and maintenance presented is considered appropriate.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**~~The~~ 7.2 Outline CoCP Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [~~APP-265~~Revision C].** and is appropriate for managing construction impacts from the Project.	BBC agrees that OCoCP is appropriate for managing relevant construction impacts from the Project.	Agreed
~~Other matters as required~~				

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status

3.10 Cumulative Effects

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [~~APP-126~~Revision B]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BBC agrees that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed
EIA – Approach and Methods				
3.10.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	BBC agrees with the study area.	Agreed
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 of **6.17 Environmental Statement Chapter 17 -**	BBC agrees that sufficient desktop and survey data has been collected to inform the assessment as presented.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Cumulative Effects [~~APP-281~~Revision B].		
3.10.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The Applicant is aware of the Brentwood Southern Growth Corridor and the development sites identified (which include Dunton Hills Garden Village). As part of the DCO process, the Applicant has undertaken a cumulative effects assessment (CEA) in accordance with ~~the~~ **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** which is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [~~REP4-163~~Revision B].**	BBC agrees with the assessment methodology.	Agreed
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.4 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]**. The key parameters and assumptions presented are considered appropriate. An assessment of Cumulative Effects undertaken in accordance with ~~the~~ **6.19 Scoping Report [APP-288 -to APP-296]** and **6.20 Scoping**	BBC agrees that key parameters and assumptions presented are considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Opinion [APP-297] is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [~~REP4-163~~Revision B]**. The assessment includes cumulative effects with the Lower Thames Crossing and Dunton Hills Garden Village (DHGV). All known developments that might impact the Primary Access Routes (PARs) using the local highway network were identified and considered in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. The DHGV was included within the review of committed developments but was excluded from the assessment given the operational phase would not coincide with the peak year construction activity for the Project. Details on construction programmes and flows were not available. Brentwood Enterprise Park is located approximately 6 km from the nearest PAR. Flows from this development are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within our assessments. No significant effects were concluded for		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		traffic and transport, noise or socio-economics with Dunton Hills Garden Village. No significant effects were concluded for traffic and transport, noise or socio-economics with the Lower Thames Crossing.		
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]**. The baseline conditions and receptors presented are considered appropriate. National Grid will continue to engage with BBC on this matter.	BBC agrees that the baseline conditions and receptors presented are considered appropriate.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Section 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in Section 17.6	BBC agrees that standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and set out in the **7.2 Outline Code of Construction Practice [~~REP4-164~~Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.10.9	Additional mitigation	The consideration of additional mitigation measures is presented in Sections 17.64 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [~~REP4-163~~Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BBC agrees that additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed
EIA – Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Sections 17.4 and 17.57 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [~~REP4-163~~Revision B]**. The assessment of effects during construction presented is considered appropriate. ~~**Please see response to ID 3.10.5 for**~~	BBC ~~remains concerned~~has consistently expressed concern about the cumulative impacts arising from the ~~Norwich to Tilbury project~~Project being delivered alongside other major developments, notably ~~DHGV~~Dunton Hills Garden Village and the Lower Thames Crossing ~~(LTC). The~~but also the Brentwood Enterprise Park and forthcoming proposals for that area. BBC considers that the co-location and potentially overlapping ~~construction timeframes~~time frames of these schemes ~~are likely to~~– with construction programmes still uncertain and subject to change	~~Under discussion~~ Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~response on DHGV and LTC.~~ The Applicant does not agree with BBC's assertion that cumulative effects have not been adequately assessed. 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~~Revision B]**. The assessment considers both intra-project and inter-project cumulative effects and includes relevant committed, consented and reasonably foreseeable developments identified in accordance with established EIA practice. Significant cumulative effects have been identified where supported by the evidence, and the assessment has been updated throughout the Examination process (at Deadline 4) to reflect new information and emerging developments where relevant. The assessment includes cumulative effects with the Lower Thames Crossing (LTC) and Dunton Hills Garden Village (DHGV). Please see response to ID 3.10.5 for response on DHGV and LTC. All known developments that might impact the Primary Access Routes (PARs) using the local highway network were identified and considered in **6.16 Environmental**	– could amplify adverse effects across multiple receptors, including traffic, noise~~,~~ and community amenity. ~~While~~BBC has expressed further concern that whilst the Applicant has indicated engagement with National Highways to address cumulative impacts, no substantive evidence has been provided to demonstrate how these will be effectively mitigated. ~~In particular,~~This situation is amplified by there ~~is~~being no information on the detailed phasing of the ~~Norwich to Tilbury project~~Project, which ~~is~~would be essential to minimise any disruption and manage cumulative effects on host communities. ~~The Council also reiterates~~Furthermore, BBC has maintained its concerns ~~raised during statutory consultation regarding~~on the wider Brentwood Southern Growth Corridor~~, which includes~~ (including both DHGV and Brentwood Enterprise Park~~. These~~) and the strategic developments either proposed or coming forward in this area. BBC considers that these developments, combined with the ~~proposed~~construction of the transmission infrastructure~~,~~ not only in Brentwood, but in neighbouring Basildon and Thurrock, could present significant risks to the local road network and access ~~arrangements. The Council requests that the Applicant explore alternative access options aligned with the phasing of DHGV to~~arrangement. BBC considers that as further information becomes available on each of these strategic developments and construction phasing becomes	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Statement Chapter 16 - Traffic and Transport [~~APP-271~~Revision B] and **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337].** The DHGV was included within the review of committed developments, but was excluded from the assessment given the operational phase would not coincide with the peak year construction activity for the Project. Details on construction programmes and flows were not available. Brentwood Enterprise Park is located approximately 6 km from the nearest PAR. Flows from this development are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within our assessments. No significant effects were concluded for traffic and transport, noise or socio-economics with Dunton Hills Garden Village. No significant effects were concluded for traffic and transport, noise or socio-economics with the Lower Thames Crossing. Section 6.6 of **7.3 Outline Construction Traffic Management Plan (Revision F)** states that '*National Grid has committed to join and engage with a Developer's Forum to be set up by Essex County Council … to continue and formalise project coordination'.*	detailed for the Project, that access options will need to be reviewed to explore alternatives, reduce harm and to maintain safe and efficient operation of the local highway network. In light of the above, BBC therefore does not agree that the cumulative effects of construction have been properly assessed and would request that as more detailed construction information becomes available on all of the proposals in the Borough and in particular in its southern corridor, that these are subject to a robust cumulative impact assessment with a commitment to appropriate and enforceable phasing and mitigation measures to address identified impacts. ~~BBC considers that the cumulative impacts of construction of these projects have not been adequately assessed in accordance with NPS EN-1 and EN-5 and requests that the Examining Authority require the Applicant to provide a robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.~~	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		Finally, the Applicant does not agree that additional enforceable phasing controls or bespoke cumulative mitigation measures are necessary. The assessment has taken account of the embedded, standard and topic-specific mitigation secured through the draft DCO, and no evidence has been presented to demonstrate that additional controls would materially alter the assessment conclusions. The Applicant considers that the cumulative effects assessment complies with the requirements of NPS EN-1, NPS EN-5 and the EIA Regulations and provides the Examining Authority with a sufficient and robust evidence base upon which to reach an informed decision. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
3.10.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.57 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [~~REP4-163~~Revision B]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	BBC agrees that the assessment of effects during operation and maintenance is considered appropriate.	Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	~~The~~ **7.2 Outline CoCP Code of Construction Practice [~~REP4-164~~Revision G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [~~APP-281~~Revision B]** and is appropriate for managing construction impacts from the Project. ~~A meeting was held on 9th October to agree on the structure for the **7.2 Outline Code of Construction Practice [REP4-164].**~~ ~~A further meeting was held on 29th January 2025 to address comments from stakeholders.~~	BBC ~~supports the ECC position on this issue~~considers that given its ongoing concerns on construction effects, that it also considers that the CoCP does not address mitigation measures to capture these impacts. BBC therefore does not agree with this matter.	Not agreed
~~**Other matters as required**~~				

3.11 Development Consent Order

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

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

This table contains the views of the Applicant and BBC up to and including the draft DCO submitted at deadline 5 **[REP5-060]**. Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[PD-011]**, it has not been possible to include updates to the draft DCO after this iteration.

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

The Applicant and BBC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

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

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
3.11.1	DCO Requirements – Stages of authorised development	The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) within that period. However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout **3.1 Draft DCO [~~REP4-037~~REP5-060]**. The Applicant ~~considers it is unlikely that the two parties will find~~recognises that a mutually agreed position has not been reached, and therefore ~~suggest this~~the matter is ~~moved to~~recorded as Not Agreed.	BBC acknowledges that Schedule 3 Para 3(1) requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than ~~seven~~five business days prior to the date on which those pre-commencement operations are first carried out. BBC considers that this time frame is too short for the ~~requirements~~demands it places on the relevant local authorities and believes that further ~~consideration~~thought should ~~therefore~~ be given to how the processes and timescales are set out in this and various parts of the dDCO, and their effect on the ability to fully consider and discharge requirements. BBC therefore considers that this matter is not agreed.	Not Agreed
3.11.2	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	BBC ~~is~~acknowledges that the 28-day decision period has now been amended to a 25 business day decision period, but remains of the view that the timeframes set out for discharging requirements must allow sufficient opportunity to undertake necessary checks, consult stakeholders, and respond appropriately~~.~~ and therefore BBC does not consider that the current	Not Agreed

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		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 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	~~dDCO~~ 25 business day period from first registration to decision is sufficient for this to be done thoroughly and properly. ~~This~~BBC considers that the time frame has been more strongly justified by NGET's position that "shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address"~~. BBC~~, but does not accept this position ~~but~~and wishes to ~~put on~~ record that NGET recognises that they are using shorter time limits that are to the detriment of the local authorities along the route~~.~~ to fulfil their relevant contractual obligations. BBC therefore does not agree with this matter.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft DCO [~~REP4-037~~REP5-060]** 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. The Applicant ~~considers it is unlikely that the two parties will find~~recognises that a mutually agreed position has not been reached, and therefore ~~suggest this~~the matter is ~~moved to~~recorded as Not Agreed.		
3.11.3	DCO Requirements – Additional requirements (Register of requirements)	The Applicant notes the authority's comments regarding the Requirements and awaits further detailed comments. ~~The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State.~~ The Applicant has ~~prepared drafting to be included in **3.1 Draft Development Consent Order**~~submitted its proposed drafting at Deadline 5 in **Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** in relation to post-consent discharge functions, including the proposed involvement of the Department	BBC is of the view that the draft Requirements require further discussion, particularly in relation to construction hours, piling, and noisy works. Communities must have appropriate periods of respite from intrusive construction activity. For transparency and accountability, the Council acknowledges that NG will now give consideration to the inclusion of a Register of Requirements within the next revision of the dDCO, similar to that adopted for the Lower Thames Crossing, to ensure ongoing fairness and clarity throughout the project's delivery.	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		for Energy Security and Net Zero (DESNZ) in the discharge of Requirements ~~and will consider whether a Register of Requirements can be incorporated into the next revision of the draft DCO.~~. The Applicant considers that each authority should maintain their own register of DCO Requirement discharge applications, as it would for planning condition discharge applications where they are the discharging authority. The Applicant notes that it is not yet known whether DESNZ will maintain a publicly available register of Requirement discharge applications and decisions. Should DESNZ not provide such a register where it is the discharging authority, the Applicant will maintain and make available a register of Requirements to provide a consolidated record of Requirement discharge applications and decisions. The Applicant is committed to continue discussions with BBC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.11.4	DCO Requirements – Additional requirements (BNG delivery plan)	On-site BNG is already secured under Requirement 4 of **3.1 Draft DCO [REP5-060]**, through the Final LEMP(s), which requires approval by Local Planning Authorities. These plans include all relevant habitat, management and monitoring details. The Statutory Biodiversity Metric and	BBC ~~considers~~acknowledges that a post-consent programme of ecological mitigation measures and a BNG delivery plan ~~should also~~will be secured through DCO requirements and this remains under discussion.	~~Not Agreed~~Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		methodology will not change from that assessed in **7.1 Biodiversity Net Gain Report [Revision B].** Details of off-site biodiversity units will be provided pursuant to a requirement in the draft DCO. The units will be purchased from commercial providers, legally secured via section 106 agreements between biodiversity unit providers and planning authorities, or Conservation Covenants with Responsible Bodies as part of the registration process. These agreements outline the legal obligations and responsibilities of the landowner in creating and maintaining biodiversity improvements. These mechanisms already provide enforcement and long-term security. BNG is a voluntary commitment for the Project, but the Applicant has nonetheless committed to delivering 10 % BNG. The approach taken is therefore proportionate to its voluntary status. For these reasons, the Applicant considers that additional approval mechanisms in **3.1 Draft DCO [REP5-060]** are not necessary. ~~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~~		

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		~~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.~~The Applicant is committed to continue discussions with BBC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
~~**Other matters as required**~~				

~~3.12 Other Matters~~

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Appendix A
Draft DCO Wording

This table contains the views of the Applicant and BBC up to and including the draft DCO submitted at deadline 5 **[REP5-060]**. Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[PD-011]**, it has not been possible to include updates to the draft DCO after this iteration.

The Applicant and BBC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

Table A.1 Comments on the draft DCO

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
1. ~~1.~~	DCO Wording – DCO Structure	The Applicant's position remains that, whilst it has necessarily adapted precedent drafting, the draft Development Consent Order is bespoke to this particular Project and its needs and circumstances. In preparing the **3.1 Draft ~~Development Consent Order [Revision C~~DCO [REP5-060]**, recent precedents have been followed and guidance in Advice Note 152 and Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to the **3.1 Draft ~~Development Consent Order [Revision C~~DCO [REP5-060]** on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The structure and content of the **3.1 Draft ~~Development Consent Order [Revision C~~DCO [REP5-060]** is referenced extensively through	BBC acknowledges that the dDCO broadly follows the structure of previously approved DCO's but considers that given the scale and complexity of this Project, it is essential that the Order reflects local requirements and does not simply replicate precedent where this would compromise effective implementation. BBC also notes several areas of the dDCO that require clarification and possibly amendment. This matter remains under discussion. ~~(Para 9.1)~~	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		the application documents and any material change to the structure of the document in particular would require the updating of a very significant amount of the application documentation and cannot be supported on that basis given the scale of the application that has to be examined in the Examination period.		
2. ~~2~~ .	DCO Wording – Definition of Maintain	The Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, "provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement", is included in the definition of "maintain". The Applicant's position is 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.	BBC understands that the definition of "maintain" includes a wide range of specified operations in relation to the authorised development which can be undertaken subject to those works not giving rise to any materially new or materially different environmental effects to those identified in the Environmental Statement. The Applicant refers to precedent and that it is not necessary or appropriate for there to be any external oversight of what is new or materially different. The Applicant also refers to its statutory duty to maintain a safe and efficient transmission network. However, BBC considers this has little bearing on whether those works covered by the definition of maintain have any new or additional environment effects. BBC acknowledges that certain works including inspect, repair, dismantle, remove, clear, refurbish, paint, surface treat, and decommission are unlikely to give rise to new or materially different environmental effects. However, works involving alteration, improvement, reconstruction or replace, which are also covered by the current definition, do retain the	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
			potential to give rise to new or materially different environmental effects. If these operations are to remain within the definition of 'maintain', BBC is of the view that to provide clarity and avoid any dispute, the DCO should incorporate a mechanism for determining whether such maintenance works give rise to materially new/different environmental effects. BBC therefore considers that the definition of 'maintain' should be amended to include: "provided such works do not, in the opinion of the local planning authority, give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of 'maintain' must be construed accordingly."	
3. ~~3~~ .	DCO Wording - Definition of "relevant planning authority"	Where local government reorganisation results in more than one successor authority across a current given area — as may well occur across Essex — the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is already optimally structured from a statutory drafting perspective to address the scenario Brentwood describes. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant	BBC acknowledges that in light of previous host authority responses, the Applicant has reframed the definition of 'relevant planning authority'. However, the substantial majority of post-consent discharge activity on the Project will occur after April 2028, by which point the two-tier structure across Essex will have ceased to exist. BBC considers that the Applicant's reframing does not fully capture that transition.	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		planning authority geographically as being the one for "the area to which the provision relates" in each case. The addition of "or successors" (plural) is unnecessary: the reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.		
4. 4 .	DCO Wording – Order limits	The Applicant considers the scope of the authorised development and limits of deviation to be sufficiently clear.	BBC also maintains its position that further clarity is needed on the scope of authorised development and the limits of deviation, so	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		The authorised development and associated development are described in Schedule 1 to the **3.1 Draft ~~Development Consent Order [Revision C~~DCO [REP5-060]**. The authorised development is further shown on the **2.3 Works Plans [APP-017 – APP-024]**. In addition, the Applicant submitted a **5.14 Details of Associated Development, with references to documents [APP-121]** report with its application, which delineates the authorised development and the associated development. The Limits of Deviation are set out in Article 5 (limits of deviation) to the **3.1 Draft ~~Development Consent Order [Revision C~~DCO [REP5-060]** and are shown on the **2.3 Works Plans [APP-017 – APP-024]** and in the table of parameters at the back of the Works Plans for each section.	that the consent granted accurately reflects the development examined.	
5. ~~5.~~	DCO Wording – Disapplication of Hedgerows Regulations 1997	Hedgerow surveys in line with the Hedgerows Regulations 1997 have been undertaken across the route. Details of these hedgerow surveys have been presented within **6.8 Environmental Statement Chapter 8 Ecology and Biodiversity [~~AS-026~~Revision B]** and **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [~~APP-161~~Revision B]**. All native species hedgerows are considered to be Habitats of Principal importance and are to be safeguarded. Impacts to hedgerows have been minimised as far as possible. Measures to safeguard hedgerows are presented within **7.4 Outline Landscape and Ecological Management Plan [~~AS-046~~Revision G]**and therefore the Applicant is satisfied that there will be sufficient protections in place for hedgerows, even with	BBC is concerned about the proposed disapplication of the Hedgerows Regulations 1997 under Article 50. Before this can be agreed, the Applicant must provide a proper assessment of the impact on protected hedgerows and demonstrate how these will be safeguarded.	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		the disapplication of the Hedgerow Regulations 1997. The Applicant has committed to monitoring/managing all tree, hedgerow and aquatic planting on-site for five years. Long-term management, monitoring and reporting of the Environmental Areas will be undertaken for a minimum of 30 years. Further information can be found in 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports ~~(Final Issue A)~~ [REP2-030].**		
6. ~~6.~~	DCO Wording – Protective Provisions	The Applicant notes that Essex County Council has raised comments on the protective provisions and the Applicant has responded to these directly. The Applicant ~~is continuing~~has continued to engage with the relevant highway authorities on protective provisions and a framework highways agreement, the latter of which the Applicant understands to be the highway authorities' preference, albeit there has been limited engagement from the authorities.	In relation to dDCO Part 3, Part 6 Section 49, as well as Schedule 2 Part 1, Schedule 2 Part 6, Schedules 5-9 and Schedule 13, ECC has raised detailed concerns regarding protective provisions in its capacity as highway authority for the borough, and BBC supports this need for robust measures to ensure the integrity of the local highway network, particularly in the context of the cumulative impacts as set out in the relevant section above. (Para 9.2-9.6) As highway authority for the borough, Essex County Council has raised detailed concerns regarding protective provisions, and Brentwood supports the need for robust measures to ensure the integrity of the local highway network.	Under discussion
7. ~~7.~~	DCO Wording – Register of Requirements	The Register of Requirements referred to in the A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State.	Similar to that adopted for the Lower Thames Crossing, BBC also strongly encourages the inclusion of a Register of Requirements within the DCO for the purposes of	Under discussion

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

ID	Matter	National Grid's Position	Brentwood Borough Council's Position	Status
		The Applicant ~~has prepared drafting to be included in **3.1 Draft Development Consent Order**~~ submitted its proposed drafting at Deadline 5 in **Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** in relation to post-consent discharge functions, including the proposed involvement of the Department for Energy Security and Net Zero (DESNZ) in the discharge of Requirements and ~~will consider~~is considering whether a Register of Requirements ~~can~~needs to be incorporated into the ~~next revision of the~~ draft DCO.	transparency and accountability and to ensure ongoing fairness and clarity throughout the Project's delivery.	

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

[redacted] [redacted]

Date:

17/07/2026

Signed for and on behalf of Emma Goodings, Director – Place of Brentwood Borough Council:

[redacted] [redacted]

Date:

17/07/26

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Abbreviations

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

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Abbreviation	Full Reference
WFD	Water Framework Directive
WHIASU	Wales Health Impact Assessment Support Unit
WIIA	Waste Infrastructure Impact Assessment
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

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

Registered in England and Wales
No. 4031152
nationalgrid.com

Docusign Envelope ID: 0541A225-7015-81DA-81CA-4E47972D485F

Summary report: **Litera Compare for Word 11.16.0.74 Document comparison done on 7/16/2026 4:10:57 PM**	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: 5.9.11 Draft Statement of Common Ground - Brentwood Borough Council_Revision D_Clean Version.docx	
Modified filename: 5.9.11 Signed Statement of Common Ground - Brentwood Borough Council_Revision E_Clean Version.docx	
Changes:	
Add	715
~~Delete~~	707
~~Move From~~	0
Move To	0
Table Insert	17
~~Table Delete~~	49
Table moves to	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	1488