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Norwich to Tilbury

Volume 5: Reports and Statements

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

Final Issue F

July 2026

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nationalgrid

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1. Introduction

1.1 Overview

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

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

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

1.2 Summary of matters Under Discussion

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

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
Project development, description and design		
3.2.6g Dunton Hills Garden Village – tree planting	The Applicant and ECC are committed to continuing discussions regarding tree planting and landscape compensation at Dunton Hills Garden Village.	Discussions will conclude after finalisation of this SoCG
3.2.7 – Design principles	ECC feels there is an opportunity to be innovative in the approach to design and suggested the Applicant must follow a good design process to ensure that infrastructure remains functional and safe while considering best local design and environmental outcomes, especially around the EACN and would wish to see commitments around the issue of design informing the draft DCO / Schedule of Requirements. The primary design requirement for electricity infrastructure is that it must be safe and sure, acknowledging functional constraints. While the overall design is largely fixed, smaller design details, such as the colour of finishes, are agreed upon and documents through the DCO process. This position is provided in Section 3.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**	Discussions will continue following the close of the examination.
3.2.12 - Community Benefits	ECC strongly encourages National Grid to positively respond to the issue of social value and community benefits. In particular, ECC believes significant benefits should be realised from the Project for education, skills, and employment during construction and operation. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**	Matter is unlikely to be agreed during the examination as it would be delivered outside the development consent process

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.2.13 – Legal Agreements	The Applicant will secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.	Discussions will conclude after finalisation of this SoCG through wording of the requirements.
3.2.14 – Landscape and visual compensation	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.	Discussions will conclude after finalisation of this SoCG through wording of the requirements
Ecology and Biodiversity		
3.3.15 – Biodiversity Net Gain – onsite and assessment	ECC would like this matter to remain Under Discussion until the matter relating to replacement tree and hedgerow planting is resolved.	Matter will remain under discussion and will conclude after finalisation of this SoCG.
3.3.16 – Biodiversity Net Gain - offsite	ECC is seeking further clarification regarding offsite BNG. The Applicant notes that this will be secured by requirement and delivered through collaboration with partners and purchased from commercially registered providers.	Engagement on this matter will continue post DCO Examination period.
3.3.17 – Arboriculture Impact Assessment	This remains Under Discussion pending agreement to proposed mitigation and compensation measures. It is recognises that these are now being secured via a requirement within the DCO – engagement is ongoing on the detail of this requirement.	Discussions will conclude after finalisation of this SoCG
Green Infrastructure		
3.4.1 - Data sources (ecology matters)	ECC maintains that The Essex Local Nature Recovery Strategy (LNRS) mapping should be incorporated into the desktop study. The Applicant maintains that sufficient data informs the assessment and will consider the Recovery Strategy as part of the off-site BNG selection process.	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.4.2 - Standard mitigation 3.4.3 - Additional mitigation	ECC requests GI principles are integrated into the mitigation hierarchy. ECC states that GI delivery should be explicitly aligned with the Essex GI Strategy. The Applicant confirms the commitment to achieving wider strategic outcomes at the local level through BNG commitments. ECC is awaiting further details around the procurement process for BNG.	Discussions will conclude after finalisation of this SoCG
3.4.4 - Outline LEMP	ECC requests clarity on long-term monitoring for BNG delivery. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas. Detail on habitat management and monitoring will be set out in the final Landscape and Ecological Management Plan post consent. ECC seeks clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery.	Discussions will conclude after finalisation of this SoCG
3.4.5 - Biodiversity Net Gain 3.4.8 - Outline LEMP (landscape and visual)	ECC recommends that more than 10% BNG is delivered, and to ensure delivery is in line with the Essex LNRS. Further detail is requested on how LNRS mapping and priority habitats have informed the site selection and design of BNG interventions. ECC is concerned about double-counting between mitigation, enhancement, and compensation. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites. ECC seeks clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery.	Discussions will conclude after finalisation of this SoCG
3.4.6 - Embedded mitigation (landscape and visual)	ECC requests GI is used as a component of landscape mitigation and is aligned with LNRS strategies. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances.	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.4.7 - Additional mitigation (landscape and visual)	Discussion ongoing regarding compensation measures and offsite BNG provision. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.	Matter unlikely to be agreed during Examination, as this is a post-consent matter.
Contaminated Land, Geology and Hydrogeology		
3.5.3 – Operational (and maintenance) effects	Further discussion is required regarding safeguarding of mineral deposits and the MWPA's call for sites for the emerging Essex Minerals Local Plan	Engagement on this matter will continue post DCO Examination period.
Socio-economics, Recreation and Tourism		
3.10.13 – Skills and Training	ECC welcomes the addition of a Skills and Employment Plan (ESP), but request that the final plan be subject to approval by the relevant LPA and suggests additional content. The ESP is secured by Requirement 15 of **3.1 Draft DCO [REP5-060] and includes submission to the** relevant local authority. Delivery of the Final ESP will be the responsibility of National Grid. Both ECC and the Applicant will continue discussions regarding the ESP.	Engagement on this matter will continue post DCO Examination period.
Traffic and Transport		
3.11.9 - Key parameters and assumptions – monitoring, management and mitigation	ECC has accepted the figures in the trip generation, subject to the numbers being monitored and managed with mitigation. The Applicant is continuing engagement with ECC to agree the monitoring, management and mitigation measures.	Matter is unlikely to be agreed during Examination.
3.11.11 – Assessment of traffic impact on PARS – highways and identification of mitigation	The Applicant will continue to liaise with ECC on the junctions and PAR links where ECC believesthat further monitoring and/or mitgation measures should be considered.	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.14 - Embedded mitigation – monitoring and management of workforce	The Applicant will continue to liaise with ECC on construction worker travel.	Matter is unlikely to be agreed during Examination.
3.11.15 - Embedded mitigation – arrangements for emergency maintenance	The Applicant is engaging with ECC on the subject of emergency callouts that could reasonably be attributed to the Project.	Matter is unlikely to be agreed during Examination.
3.11.17 - Embedded mitigation – monitoring vehicle numbers	The monitoring, management and mitigation of construction vehicles numbers is Under Discussion between ECC and the Applicant.	Matter is unlikely to be agreed during Examination.
3.11.18 - Standard mitigation	ECC has sought wider commitment to engaging with the public. The Applicant will continue to discuss this with ECC.	Matter is unlikely to be agreed during Examination.
3.11.20 – Additional mitigation – peak hour restrictions	ECC has sought a commitment to assess construction workers arriving/departing during the peak hours. The Applicant will continue to discuss this with ECC.	atter is unlikely to be agreed during Examination.
3.11.21 – Additional mitigation - Schools	The Applicant will continue to liaise with ECC in relation to additional mitigation at junctions and construction traffic restrictions proposed in the vicinity of schools.	Matter is unlikely to be agreed during Examination.
3.11.22 – Construction effects – Spa Road	The Applicant will continue to liaise with ECC in relation to the evaluation of construction effects and accommodating HGV movements on Spa Road, Witham.	Matter is unlikely to be agreed during Examination.
3.11.27 – Construction effects	The Applicant will continue to liaise with ECC in relation to construction impacts outside of peak activity on select PARs	Matter is unlikely to be agreed during Examination.
3.11.33 - Impact on Parking - inconsistencies	ECC and the Applicant will continue to liaise in relation to parking impacts, and street parking restriction. The Applicant has reviewed the inconsistencies raised by ECC and these have been corrected through the Deadline 6 ERRATA submission.	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.34 - Existing roadside facilities	The Applicant will continue to liaise with ECC in relation to the impact on existing HGV driver facilities and measures.	Matter is unlikely to be agreed during Examination.
3.11.36 - Road Safety	ECC and the Applicant will maintain ongoing discussions in relation to road safety improvements along the PARs.	Matter is unlikely to be agreed during Examination.
3.11.39 to 3.11.43 – Transport Assessment - Junction mitigation measures	The Applicant will continue to liaise with ECC on these matters.	Matters are unlikely to be agreed during Examination.
3.11.53 - Pre-and Post Construction Surveys	The Applicant will continue to liaise with ECC in relation to pre- and post-construction surveys and maintenance liability for local highway network.	Matter is unlikely to be agreed during Examination.
3.11.55 - Implementation/ Enforcement	The Applicant and ECC are continuing discussions on monitoring, management and mitigation (with to the implementation and enforcement process set out in CTMP).	Matter is unlikely to be agreed during Examination.
3.11.56 – Outline CTMP – Additional CTMP updates requested	The Applicant will continue discussions with ECC regarding suggested wording to include in the Outline CTMP.	Matter is unlikely to be agreed during Examination.
3.11.59 - Targets, Strategy, and Measures	ECC has requested a commitment to the provision of mini buses. The Applicant will continue to discuss this with Main Works Contractor(s) and ECC once more details are known about the location of construction staff at the next stage of design.	Matter is unlikely to be agreed during Examination.
3.11.60 - Targets, Strategy, and Measures	ECC has requested The Applicant provides clarification on parking numbers, number of workers and worker arrivals/departure times, and management and interventions proposed by the Applicant in the CTMP. The Applicant will continue to liaise with ECC on this matter.	Matter is unlikely to be agreed during Examination.
3.11.61 – Targets, Strategy and Measures	The Application will continue to liaise with ECC in relation to the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the final CWTP).	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.62 - Monitoring and Review	The Applicant will continue to liaise with ECC in relation to the Monitoring and Review process described in the CWTP.	Matter is unlikely to be agreed during Examination.
3.11.67 - Construction Access and Crossover Design	The Applicant will continue to liaise with ECC in relation to proposed site access and crossover points.	Matter is unlikely to be agreed during Examination.
3.11.76 - Traffic Regulation Orders and Temporary Traffic Regulation Orders – Diversion Routes	ECC seeking confirmation of checks done on diversion routes for proposed TROs (structural, width, height and environmental restrictions). The Applicant will continue to liaise with ECC on this matter.	Matter is unlikely to be agreed during Examination.
3.11.81 - Proposed Highway Mitigation Design on Wick Lane	The Applicant will continue to liaise with ECC in relation to ECC concerns on the highway mitigation proposal for Wick Lane.	Matter is unlikely to be agreed during Examination.
3.11.82 - Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road	The Applicant will continue to liaise with ECC in relation to ECC concerns on the highway mitigation proposal for Ardleigh Road / Bentley Road.	Matter is unlikely to be agreed during Examination.
3.11.84 - Abnormal Indivisible Load (AIL) Access Routes	The Applicant will continue to liaise with ECC in relation to structural investigations for AIL movements and AIL tracking drawings.	Matter is unlikely to be agreed during Examination.
3.11.86 - Abnormal Indivisible Load (AIL) Structural Investigations	The Applicant will continue to liaise with ECC in relation to structural assessments along the selected AIL routes that are to be completed by the Contractor.	Matter is unlikely to be agreed during Examination.
3.11.87 - Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant will continue to liaise with ECC in relation to road safety audits that involve proposed AIL movements and if a Road Safety Audit at Beaulieu Parkway Roundabout is suitable.	Matter is unlikely to be agreed during Examination.
3.11.91 – Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant will continue to liaise with ECC in relation to potential cost recovery through a Planning Performance Agreement (PPA) or other appropriate legal mechanism.	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
3.11.92 – Extraordinary maintenance	The Applicant will continue to liaise with ECC to agree on a mechanism for the reimbursement of extraordinary maintenance expenses.	Matter is unlikely to be agreed during Examination.
3.11.93 – Legal agreements	The Applicant will continue negotiations with ECC on a Framework Highways Agreement/Protective provisions.	Discussions will conclude after finalisation of this SoCG
Public Rights of Way (PRoW)		
3.12.3 - Proposed Management Regime Approach	The Applicant will continue to liaise with ECC in relation to PRoW should they be identified to be permanently stopped-up, and consult with ECC to agree the appropriate mitigation. ECC has raised considerable commentary on the PRoW Management Plan which requires consideration by the Applicant.	Matter is unlikely to be agreed during Examination.
Cumulative Effects		
3.13.5 - Key Parameters and assumptions	ECC remains concerned that certain assumptions underpinning the cumulative effects assessment. The Applicant considers the methodology for the cumulative effects assessment to be appropriate and was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Engagement will continue post DCO examination.
3.13.12 – Outline CoCP	ECC is reviewing the updated **7.2 Outline Code of Construction Practice [Revision G]** and will provide the Applicant with an update once complete.	Engagement will continue post DCO examination.
Development Consent Order		
3.14.3 – Construction environmental management plans	ECC seeks justification for the absence of a CEMP, clarification that the Outline Code of Construction Practice and its appendices provide equivalent controls, and inclusion of additional consultees. The Applicant considers that **7.2 Outline Code of Construction Practice [Revision G]** and appended plans provide the	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	necessary controls and are secured through Requirement 4. The Applicant will continue to liaise with ECC on the inclusion of additional consultees where necessary.	
3.14.3a - DCO Requirements – Construction environmental management plans consultees	ECC consider that there are many stakeholders who should be engaged in consultation on the management plans which should be reflected within this requirement. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Discussions will conclude after finalisation of this SoCG
3.14.4 – Archaeology	ECC acknowledges that additional provisions for post-excavation analysis, publication, and archiving to secure these stages have been added to the Draft DCO but considers that the revised Requirement wording is confusing and does not reflect its proposed distinction between archaeological evaluation works and subsequent mitigation works. ECC recommends adopting the wording previously prepared by Suffolk County Council, as it considers this would provide greater clarity and a simpler structure. The Applicant will continue to engage with ECC in respect of the proposed archaeological requirement wording. .	Discussions will conclude after finalisation of this SoCG
3.14.7 – Reinstatement schemes	ECC seeks clarity on the meaning of “former use” and how reinstatement will apply, including within the 10m cable corridor. The Applicant has amended the Draft DCO to refer to “former condition” accordingly and has clarified that restrictions on reinstatement within 10m of cables are necessary for operational and safety reasons.	Discussions will conclude after finalisation of this SoCG.
3.14.13 – Register of requirements	ECC requests that a register of requirements should be maintained by the Applicant. The Applicant will continue to liaise with ECC on this matter in light of the proposed involvement of the Department for Energy	Discussions will conclude after finalisation of this SoCG.

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	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.	
3.14.14 – Additional Requirements (BNG delivery plan)	ECC considers that a BNG delivery plan and ecological mitigation measures should be secured through a DCO Requirement. The Applicant proposes to deliver at least 10% BNG. Details of onsite BNG will be provided pursuant to Requirement 4 with details of the updated BNG Assessments and offsite BNG required will be provided pursuant to Requirement 11. The Applicant does not consider additional approvals are necessary.	Discussions will conclude after finalisation of this SoCG
3.14.15 – Additional Requirements (Developer's forum)	ECC requests the establishment of a Developers Forum to coordinate and manage cumulative effects. The Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council (commitment secured within **7.3 Outline Construction Traffic Management Plan [Revision F]**). In addition, the Applicant will provide a proportionate contribution to ECC for running the developer's forum through a planning performance agreement. The Applicant will continue to liaise with ECC on this matter.	Discussions will conclude after finalisation of this SoCG
3.14.16 – Additional Requirements (HGV parking)	ECC considers that surveys and mitigation for HGV parking should be secured prior to commencement of works, potentially through a requirement or management plan. The Applicant considers that these matters are addressed within the Outline Construction Traffic Management Plan and will continue to liaise with ECC on this matter.	Discussions will conclude after finalisation of this SoCG
3.14.17 – Employment and skills plan	ECC seeks an employment and skills plan to be submitted for approval.	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter Under Discussion	Deadline for resolution
	The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this plan will be secured by a new DCO Requirement.	
3.14.21 –Submissions for discharge requirements	ECC seeks assurance that submissions will meet an agreed quality standard to enable efficient processing. The Applicant considers this is already addressed through Requirement 4, which requires submissions to be in substantial accordance with the approved outline management plans.	Discussions will conclude after finalisation of this SoCG.
Appendix A - DCO Wording	Discussions are ongoing in relation to detailed drafting points on: • Highways • Relevant Planning Authority • Application of permit schemes; • Protective provisions/ protective provisions (highways); and Certified documents.	Discussions will conclude after finalisation of this SoCG.
Other Matters		
3.15.1 - Climate Change	The Applicant has requested further information from ECC on this topic to be able to respond.	Matter unlikely to be agreed unless further information is provided.
3.15.2 – Removal of obsolete pylons	ECC welcomes the proposal to remove a number of 132 kV pylon lines and would encourage the Applicant to explore opportunities to reduce cumulative visual impact of energy infrastructure The Applicant requests ECC provides specific 132 kV lines for removal, with justification, for consideration.	Matter unlikely to be agreed
3.15.5 – Airfields	ECC reserves its position on airfields regarding confirmation of the impact on future use of airfields across the county. The Applicant's position on airfield safety and security is provided Section 3.17 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**	Discussions will conclude after finalisation of this SoCG

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1.3 Project Description

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

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

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

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

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

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1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with ECC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 0** includes the sign off sheet

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2. Record of Key Engagement

2.1 Introduction

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

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

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

2.2 Summary of Key Engagement

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

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

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

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

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

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

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Date	Format	Topic/Description
September 2024	Email Correspondence	National Grid shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex South)
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement (ECC covering Essex North)
January 2026	Meeting	Meeting to discuss Statement of Common Ground with ECC

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Date	Format	Topic/Description
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 draft bat licences, ECoW and BNG with Essex Place Services.
June 2026	Technical Note	The Applicant issued a Technical Note to outline and seek agreement on the text to be added to the Outline LEMP at Deadline 6 regarding the details for provision of Bat Roost resource compensation.
Contaminated Land, Geology and Hydrogeology		
August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).
Health and Wellbeing (including Air Quality and Noise and Vibration)		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
July 2023	Technical Note	National Grid issued a technical note to Environmental Health Officers (EHOs) to agree the approach to the operational noise impact assessment of the proposed EACN Substation.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA),

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Date	Format	Topic/Description
		including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement.
April 2026	Meeting	Meeting to discuss the Statement of Common Ground.
June 2026	Technical Note	Technical note shared which summarises the mitigation within the Outline CoCP relevant to Health and Wellbeing
Historic Environment		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities (including Essex County Council) to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.

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Date	Format	Topic/Description
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Essex County Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching

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Date	Format	Topic/Description
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Email Correspondence	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	National Grid shared additional trench plans for Site 009, Areas 26 and 34
June 2025	Email Correspondence	National Grid shared updated trench plans for Site 009, areas 26 and 34
June 2025	Email Correspondence	National Grid share an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011, 012, 013, 014 and 015
September 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 011 and 12

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Date	Format	Topic/Description
September 2025	Email Correspondence	National Grid shared updated SSWSIs sites 11 & 12
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex North)
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement (Covering Essex South and Thurrock)
October 2025	Email	National Grid shared the Trial Trench Plans for review and approval for site 009.011, and 15
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Email	National Grid shapefile for the phase 2 survey along with the priority area survey
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email	National Grid shared the WSI for the Phase 2 geophysical survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss matters relating to built heritage in the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.

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Date	Format	Topic/Description
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
July 2026	Meeting	Archaeology Working Group
July 2026	Email	Updated draft of Geoarchaeological monitoring of GI WSI shared.
Hydrology, Land Drainage and Flood Risk		
June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.
September 2024	Technical Note	National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	National Grid issued the Draft FRA for agreement/comment
January 2025	Meeting	National Grid held a meeting to discuss comments raised from the draft FRA
March 2025	Email Correspondence	National Grid issued Draft FRA for agreement/comment.

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Date	Format	Topic/Description
April 2026	Meeting	Joint meeting with SCC and Thurrock LLFA to discuss the Drainage Strategy
June 2026	Meeting	Meeting to discuss the matters under discussion within the Statement of Common Ground
July 2026	Meeting	Meeting to discuss the matters under discussion within the Statement of Common Ground
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Essex. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES. ECC provided feedback on the viewpoints at the meeting and in subsequent correspondence.
April 2023	Meeting	National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.

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Date	Format	Topic/Description
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Meeting	EACN (Statutory Consultation) Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits with ECC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape and Visual Thematic Group Meeting – LVIA Viewpoints within Essex North
October 2024	Meeting	National Grid held a focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated viewpoint information data following from the landscape thematic workshops
December 2024	Meeting	Meeting to agree photography locations and photomontages for the ES
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex South)
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)

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Date	Format	Topic/Description
October 2025	Meeting	Follow up optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement (covering Essex North)
January 2026	Meeting	Joint meeting attended by LPA's who are represented by EPS for Landscape to discuss the Statement of Common Ground.
March 2026	E-mail Correspondence	National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in ECC's Local Impact Report.
May 2026	Meeting	Meeting with Essex Place Services representing ECC on the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss and understand additional landscape and visual measures requested in Essex and justification
June 2026	Meeting	Meeting with ECC to discuss Action Point 27 from ISH2 and landscape and visual compensation opportunities
June 2026	Meeting	Meeting with Essex Place Services representing ECC on the Statement of Common Ground.
June 2026	Meeting	Follow up meeting with ECC to discuss Action Point 27 from ISH2 and landscape and visual compensation opportunities
July 2026	Meeting	Follow up meeting with ECC to discuss landscape and visual compensation opportunities and draft Article wording
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including ECC.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.

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Date	Format	Topic/Description
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email Correspondence	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the Socio Economics, Recreation and Tourism section of the Environmental Statement (Covering Essex South)
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
Traffic and Transport		
June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.

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

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

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

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

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

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Date	Format	Topic/Description
March 2026	Email Correspondence	National Grid requested structural record information for some structures along proposed AIL routes.
March 2026	Email Correspondence	ECC structural record information received (partial).
April 2026	Email Correspondence	ECC structural record information received (partial).
May 2026	Meeting	National Grid held a meeting with ECC to discuss Statements of Common Ground and to review their updated comments.
July 2026	Meeting	National Grid held a series of meetings with ECC to discuss Statements of Common Ground and to review their final comments for Deadline 7.
July 2026	Meeting	National Grid held a meeting with ECC to discuss the PRoW Management Plan and the associated Statements of Common Ground items.

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3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

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

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

Table 3.1 Agreement status for matters presented in Section 3

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

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

3.1.4 Table 3.2 to Table 3.15 provides the matters Agreed, Not Agreed or Under Discussion in relation to the various topics.

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3.2 Project development, description and design

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]**. ECC's 'In Principle Strategic Objection' is further detailed within its **LIRREP1-161] and other** submissions to this Examination ECC accepts that network reinforcement is needed to accommodate the expected growth in demand for electricity and the additional contracted / planned electricity generation in the East Anglia region. However, despite the acceptance of the need, ECC's in-principle objection continues to be for this need to be met using an integrated offshore solution that avoids the use of overhead powerlines due to their impact on communities and the environment. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed. ECC accepts this is now for the ExA to consider.	Not Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case – when offshore wind farms are contracted	ECC would refer to its Relevant Representation submission (27 November	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner Licence) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Annex 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	2025), section 4 – **Project Need Case and Alternatives [RR-1083]** and to Section 4.2 of its **LIR [REP1-161]** which provide detail on ECC's 'In Principle Strategic Objection' alongside other submissions to the Examination ECC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While ECC has had regard to the TEC Register, ECC considers it essential that in determining what future expansion is needed, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Applicant must not restrict the justification on future network expansion solely based on the ESO contracted position. Further engagement would be welcomed on this matter. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed ECC accepts this is now for the ExA to consider.	
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]** and to Section 4.2 of its **LIRREP1-161] which pro**vide detail on .	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives. For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore Alternatives' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC's 'In Principle Strategic Objection'. Alongside other submissions to the Examination ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment. The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts including landscape and visual impacts. ECC's position is that, if indeed the timing for the network reinforcement is less acute as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding). Given the stage of the DCO and the engagement thus far between the parties, ECC accepts that the opportunity has passed for meaningful discussion as to whether there are alternatives which would achieve better environmental outcomes overall than the current submitted scheme, and if so, put them forward at pace to achieve the required	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			network reinforcement instead of the submitted scheme ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed. ECC accepts this is now for the ExA to consider.	
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic bills. For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and	ECC would refer to its Relevant Representation submission (27 November 2025), section 4 – **Project Need Case and Alternatives [RR-1083]** and to Section 4.2 of its **LIR [REP1-161] which pro**vide detail on ECC's 'In Principle Strategic Objection' alongside other submissions to the Examination. ECC's preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment. Localised design responses involving undergrounding and /or alternate pylon design as part of the application of the mitigation hierarchy, should not be discounted by NG. The County Council consider such an approach would not be contrary to national policy statements and would actually be consistent with Holford Rule 7 where it states	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Underground Cables' 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.	projects should be routed to minimise as far as possible effects on development. ECC contends that insufficient weight has been to the effects of development on existing and / or planned development as well as broader strategic objectives to deliver new homes, to inform more appropriate localised design responses. ECC agrees that is unlikely that a mutually agreed position will be found, and therefore agree that this matter is moved to Not Agreed ECC accepts this is now for the ExA to consider.	
3.2.5	Policy compliance	In deciding an application for development consent Section 104 of the Planning Act 2008 requires the Secretary of State to determine the application in accordance with any relevant National Policy Statement (NPS). The NPSs relevant to this project are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) which came into force in January 2024. The National Policy Statement for Renewable Energy (EN-3 2024) also includes support for the onshore infrastructure required to deliver new offshore wind developments. Norwich to Tilbury has been developed in line with these National Planning Policies, and more information can be found in **7.21 2024 - Design Development Report for the Project [APP-**	ECC acknowledges the Applicants position set out in Section 4.2 'Planning Policy' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. ECC also acknowledges that the SoS must determine a DCO application in accordance with the relevant NPS, unless one of a range of specified exceptions applies. In addition, notwithstanding this is a project with CNP status to be applied following the application of the mitigation hierarchy, a decision can be made other than in accordance with the NPS.and S104(7) of the Planning Act 2008, It allows consent to be refused if the Secretary of State is satisfied that the adverse impacts of the proposed development outweigh its benefits.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		359] and **5.15 Design Development Report [APP-122].** For the Applicant's position on policy compliance, please refer to Section 4.2 'Planning Policy' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], Policy Compliance Tracker submitted at Deadline 1 [REP1-133] and Deadline 4 [REP4-294] (noting an updated tracker is intended to be submitted at Deadline 7).** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	In its LIR [REP1-161], ECC highlighted its opinion that this important strategic site allocation for housing had not been adequately taken into consideration to inform the evolution and design development of the Norwich to Tilbury Project. It is considered that the Applicant should have given significant weight to the effect of the pylon route on DHGV having regard to relevant NPSs and Holford Rule 7, as referred to in paragraphs 4.3.7 to 4.3.8 of ECC's LIR [REP1-161] and avoided any impact on the development of DHGV In terms of policy compliance therefore, while recognising ongoing discussions with the Applicant over mitigation, ECC is of the opinion that policy has not been appropriately applied and therefore this matter is not agreed.	
Project development process – Design				
3.2.6	Dunton Hills Garden Village	For the Applicant's position on Dunton Hills Garden Village, please refer to Section 3.8 'Alternatives – Dunton Hills Garden Village' and Appendix B in **8.8.2 Applicant's Comments on Local Impact 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 Representations [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	ECC refers to section 4.2 of its Local Impact Report **[REP1-161]** where it sets out its concerns regarding the impact of the project on the development of DHGV. Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. ECC while noting the Applicants response on this issue, maintains this will degrade the principles of a Garden Village and based on the conclusions of the Savills report considers	Not Agreed

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		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 considered Dunton Hills Garden Village during routeing and refinement of the alignment, resulting in the Applicant's decision to route the Project within an existing gas pipeline safety corridor. By doing so, and 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.	it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing, affordable housing and infrastructure. Given the current housing need within Basildon / Brentwood and across the region, the importance of this development in terms of numbers and infrastructure being delivered, this situation is not acceptable to ECC. ECC is disappointed that more weight was not given to an alternative design solution and / or mitigation along this section of the proposed route that avoided any impact on the development of DHGV. While ECC maintains an in principle objection to the proposed siting of the pylons and alignment of the route of the OHL along this section of the route, it acknowledges the Applicants comments on ECC's LIR **[REP2-030]** and is in discussion with the Applicant to secure appropriate landscape mitigation.	
3.2.6a	Dunton Hills Garden Village – Technology choice	National Grid has developed its proposal in this area in line with EN-1 and EN-5, the starting presumption being overhead line as the area is not subject to a national landscape designation (or within its setting) which would lead to a change in technology (underground cable) in line with EN-5. We do not consider the level of effects meets the threshold for undergrounding elsewhere as set out in 2.9.23 of EN-5.	As set out within the Local Impact Report **[REP1-161]** it is recognised that as a matter of principle, overhead power lines are referenced in Government policy (NPS-EN5) as the starting presumption for electricity network developments. Nevertheless, in this instance consistent with paragraph 2.9.7 of EN5 it is considered the effects of new overhead lines would give rise to adverse landscape and visual impacts, and	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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 master planning, would substantially mitigate potential effects on developable land and indirect effects.	in such situations, national policy would support the use of alternative technological solutions. The recent receipt of additional information from the Applicant on the potential implications for the developable area, it is accepted that the use of underground cabling along the eastern edge of DHGV, given the constraints of the existing high pressure gas pipeline and heritage assts would further encroach on the net developable area for DHGV. If the routing of the OHL along the eastern edge of DHGV is accepted, the option of undergrounding the cables is reluctantly conceded as not being feasible without impact on the housing numbers to be delivered by the residential development. Suggest this matter is considered agreed in respect of Undergrounding the cables	
3.2.6b	Dunton Hills Garden Village – T-pylons	**5.15 Design Development Report [APP-122]** sets out that where there is not a reversal of the presumption within EN-5 to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations where there could be a design preference for T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not considered to be engaged and, accordingly, there is no justification for T-pylons to be used on the Project.	ECC consider that placing the route underground for the length that it runs through / alongside the Garden Village would accord with the principles of good design and minimise the impact, safeguarding the viability and deliverability of DHGV. If this is not feasible, alternate pylon design should be considered alongside any identified mitigation to minimise the impact of the Norwich to Tilbury project. While acknowledging the comments on alternative pylon design and in particular T	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Pylons (APP-122 - Design Development Report), ECC considers greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. ECC also notes that, in APP-122, the Applicant addressed DHGV in section 10.4, but only considered re-routing the development as mitigation. The use of T-pylons has not obviously been considered as part of the design development. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted but ECC considers this architectural solution would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV. Therefore, it is suggested that this matter is moved to not agreed.	
3.2.6c	Dunton Hills Garden Village – ability of overhead lines and housing	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	ECC acknowledges that it is possible for new residential developments to co exist in proximity to overhead powerlines and that the proposed residential development does not conflict with National Grids Design Guidelines	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
	developments to co-exist	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 appreciates that ECC agrees that the approved Dunton Hills Garden Village development does not conflict with National Grid's Design Guidelines for Development near High Voltage Overhead Lines. Accordingly, it is clear that the Dunton Hills Garden Village development can co-exist with the proposed overhead line. The Applicant is in ongoing discussions with ECC (as well as Brentwood Council and the landowner, LIH) with regard to providing additional tree planting to the eastern side of Dunton Hills Garden Village (as referred to in 3.2.6g below).	for Development near High Voltage Overhead Lines. The objective of the DHGV and the Garden Communities Programme as evidenced through the Dunton Hill Garden Village Framework Masterplan and the Dunton Hill Garden Village SPD, is to create distinctive, high-quality, sustainable communities, which as exemplars of design, go beyond the qualities of 'standard' housing developments As set out in ECC's LIR **[REP1-161]**, its view is that the presence of overhead powerlines and pylons along the eastern edge of the development offer no potential to enhance the quality of the landscape or the amenity of DHGV. In these specific circumstances therefore, ECC maintains that in the absence of any agreed mitigation, this will degrade the design principles of DHGV Garden Village.	
3.2.6d	Dunton Hills Garden Village – effect of the project on the quantum of development	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 Village site in the knowledge of the proposed overhead line	Subject to final discussions with LIH, ECC acknowledges that the route alignment should not affect the quantum of development proposed at DHGV. ECC is concerned however about any about the impact on viability and the consequential impact on the ability to deliver policy compliant number of affordable housing as outlined in the Savills Report [REP4-328 Appendix B]. Any negative impact of the overhead power lines in terms of viability should not be used as a reason to reduce	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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.	policy target affordable housing provision upon which this scheme was based. ECC believes the power line scheme should leave a neutral impact on affordable housing provision and targets.	
3.2.6e	Dunton Hills Garden Village – viability, gross development value and landowner compensation	The Project should not impact GDV to any meaningful significant extent, certainly not enough to impact viability, and that any loss that may be suffered will be suffered by the landowner (in land value) and for which they have a recourse to compensation. As set out in relation to 3.2.6d above, LIH has recently purchased the Dunton Hills Garden 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.	The comments by the Applicant (paragraph 3.8.47 to 3.8.57 of their response to ECC's **LIR [REP2-030]**) on the Savills report commissioned by ECC have been reviewed and a further report by Savills was submitted as part of the Council's Deadline 4 submission **[REP4-328].** The report concluded that there is a significant risk that the proposed overhead power lines could materially impact on the viability and deliverability of the Dunton Hills scheme and a more certain way to proceed would be to pursue the option of underground power lines across the site or other forms of mitigation to be agreed with the relevant planning authority. It also noted that on the specifics of affordable housing viability is a material consideration and planning policy. The power line scheme should leave a neutral impact on affordable housing provision and targets.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.2.6f	Dunton Hills Garden Village – location of the play area to the south eastern corner of the DHGV site	Based on the current plans, the Project will not directly affect the location of the play area (referred to as a Local Equipment Area for Play or LEAP). Land around and underneath the proposed overhead line can be utilised by DHGV as open space as per the relevant masterplan. The DHGV site is still at the formative stage and the play area in question is located in phase 3A, planned for development in years 13-15. The Applicant is of the opinion that given the phasing, it is likely that phase 3A of DHGV would move into detailed design and the associated planning application(s) with the new overhead line in operation, therefore the play area could be located sensitively to the Project and both can co-exist accordingly.	ECC acknowledges that potential exists to relocate the LEAP play area. It considers this matter can be moved to agreed	Agree
3.2.6g	Dunton Hills Garden Village – tree planting	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. The Applicant responded to ECC's email of 6th July on 10th July, to explain that the Applicant does not consider a wider strategic landscape compensation scheme is necessary to make the	ECC understands that following a meeting with the Applicant on 31/03/26, the Applicant offered to consider what landscape compensation could be as mitigation for the impact on the setting of DHGV. ECC continues to engage with the Applicant on this matter and has identified a range of sites informed by the Local Nature Recovery Strategy and in Council ownership . While ECC does not necessarily disagree that on site planting would most likely have the greatest benefit, it will be necessary for this landscape compensation planting to be in additional to what LIH should be providing and not subsidising their necessary landscape /	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		scheme acceptable in planning terms. It is noted that DHGV has not been identified where a masterplan for landscape compensation measures for residual effects on landscape should be explored. The Applicant is committed to continue discussions with ECC, including in relation to the 3:1 tree replacement planting, which will be ongoing recognising the matter under discussion. On this basis this matter is retained as Under Discussion.	planting plans. Consequently, ECC's preference would be for an offsite planting solution to minimise some of the effects of the proposed OHL. A review of the Essex Local Nature Recovery Strategy (LNRS) opportunities and Essex County Council landholdings has identified several potential locations for woodland creation, woodland extension, and hedgerow establishment within approximately 0.5km of the site. These include strategic woodland creation areas with land of up to 10ha, 25ha and 50ha potentially available, together with around 1.5km of potential tree belt and hedgerow creation. Further opportunities for woodland and hedgerow enhancement have also been identified, including areas of approximately 25ha–50ha potentially available and up to 7.5km of linear landscape enhancement. This information was conveyed to the Applicant by email dated 6th July 2026 to help inform further discussion. as a result of which, the Applicant has confirmed their approach. The matter has progressed through further discussions. ECC is disappointed that the request for additional planting to mitigate the impact has not been agreed, and ECC does not agree that the presence of the overhead line in such close proximity to DHGV will not have any impact on the garden village setting and potentially, the long term ability of the	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			development to deliver the required level of affordable housing and infrastructure. ECC is committed to continued work to maximise opportunities presented through the Applicant's decision to pursue mitigation through the replacement 3:1 tree planting and therefore this matter remains under discussion. This matter will be raised during ECC's Closing Statement.	
3.2.7	Design principles	The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational reliability, can significantly limit National Grid's ability to adapt the aesthetic appearance of its infrastructure. Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules (relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals. While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and	ECC would refer to its Local Impact Report [REP3-0161] where its concerns about the approach to design are outlined The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Further, the Council also draws on the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design which has been prepared based on good practice and applicants are encouraged to follow the recommendations set out. In particular, it is noted the advice states "Good design is crucial for achieving excellent functionality, sustainability, positive place-making and resilience in NSIPs". The Council feels there is an opportunity to be innovative in the approach to design while	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		documented through the Development Consent Order process. Furthermore, NPS EN-1 encourages developers "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible" within the bounds of functional and safety constraints. The Planning Inspectorate Good Design advice advises that 'Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important'. EN-1 refers to the importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the **7.15 Design and Access Statement [REP2-020]**. For the Applicant's position on Design principles, please refer to Section 3.9 'Good Design' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** National Grid considers that the Project demonstrates good design through the application of established design principles, including the Holford and Horlock Rules, an iterative design process informed by stakeholder engagement, relevant national policy, and	ensuring the infrastructure remains safe and secure. It is supportive of the concerns raised by Tending District Council regarding the impact of the proposed infrastructure on the environment around Ardleigh. ECC expects to see the Applicant working alongside the promoters of North Falls (EN010119), Five Estuaries (EN010115) and Tarchon Interconnector, to ensure a joined up approach in the design of the infrastructure located in Ardleigh, and would expect engagement in any design review processes. ECC welcomes the additional information provided by the Applicant on this point. ECC notes the commitments around the issue of design review within the DASSI for a Design Review Panel. However, ECC would raise concerns regarding the robustness of the approach, as they will be hosted by the Applicant. For the design review process to be robust, the design panel must be independent. NGET must follow a good design process to ensuring that the infrastructure proposed remains functional and safe while giving sufficient consideration to and realising the best local design and environmental outcomes for the project. ECC would also refer to its response to ExQ1 question DES 1.3 from **[REP3-078]**, including the need for the project to undergo independent design review, and the need for	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		environmental mitigation developed through the EIA process. National Grid maintains that the design of electricity transmission infrastructure is necessarily governed by technical, operational, safety and security requirements, which are the primary determinants of the infrastructure's layout and form. National Grid has established a clear design framework through the Design Approach for Site Specific Infrastructure (DASSI), which sets out design principles intended to ensure that the Project responds appropriately to its context while maintaining the requirements of a nationally significant electricity transmission project. The DASSI also identifies where opportunities exist for refinement through detailed design. Recognising the co-location of infrastructure in the Ardleigh area, National Grid has engaged and continues to engage with the promoters of the North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm projects through the Joint Substation Design Guide process. National Grid considers that this coordinated approach supports the delivery of a cohesive design and landscape strategy across the co-located developments. Details of engagement and coordination between projects are also set out in 8.4.3 *Report on Interrelationship with Other Infrastructure Projects* [REP4-296]. In response to stakeholder feedback, including from Essex County Council, National Grid has updated the DASSI to include a specific design	this to be secured appropriately through the DCO. ECC wishes for this matter to remain under discussion in anticipation of proactive discussions between the County Council and the Applicant as detail design processes progress.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		principle requiring ongoing coordination between the relevant projects. National Grid has also strengthened design governance arrangements through the introduction of a Design Review Panel (DRP), which will provide multidisciplinary review of detailed design proposals. Relevant local planning authorities, including Essex County Council where appropriate, will be invited to participate in the DRP alongside specialists and technical experts. National Grid has further strengthened the design controls secured through the draft DCO by updating Requirement 12 to ensure that permanent buildings and link pillars accord with the DASSI and that details of colour and material finishes are approved by the relevant planning authority before construction commences. National Grid considers that, although there is limited scope to amend the fundamental layout of the infrastructure due to technical and operational constraints, opportunities remain through detailed design to refine landscape integration, material finishes and site-specific design details. National Grid therefore considers that the updated DASSI, design governance framework, Design Review Panel and DCO requirements provide a robust and proportionate mechanism to secure good design, ongoing coordination with adjacent infrastructure projects, and the delivery of a well-integrated, context-responsive and functional development.		

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
Project development process - Consultation				
3.2.8	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation and responses to feedback received during consultation are included in **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068].** The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	ECC acknowledges the non-statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25 (AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application. ECC refers to its response to this consultation dated 16th June 2022 and to its response to the Adequacy of Consultation dated 15.09.25 (AoC-009).	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 **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.	ECC acknowledged the non-statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25 (AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application. ECC refers to its response to this consultation dated 14th August 2023 and to its response to the Adequacy of Consultation dated 15.09.25 (AoC-009).	Agreed

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3.2.10	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in **5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]**. Responses to feedback received during statutory consultation are available within **5.1 Consultation Report [Revision B]**. The statutory consultation was undertaken in accordance with the published SoCC.	ECC acknowledged the statutory consultation was undertaken in accordance with the Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25(AoC-009). This conclusion was not a view on the merits of the application, nor whether the matters raised through the consultation process have been adequately addressed in the design evolution of the proposal or the preparation of the of the application ECC refers to its response to this consultation dated 26th July 2024 and to its response to the Adequacy of Consultation dated 15.09.25 (AoC-009).	Agreed
3.2.11	2025 targeted consultation	Targeted consultations for Essex took place from 25 February - 27 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within **5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-077].** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for	ECC acknowledged the non-statutory targeted consultation was undertaken in accordance with the Targeted Consultation Strategy in its response to the Adequacy of Consultation dated 15.09.25 (AoC-009). ECC refers to its response to this consultation dated 15 April 2025 and to its response to the Adequacy of Consultation dated 15.09.25 wherein comments on the consultation were made.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Nationally Significant Infrastructure Projects (April 2024).		
Other matters as required				
3.2.12	Community benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 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. 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 is committed to continue discussions with ECC, which will be ongoing recognising the matter under discussion. On this basis this matter is retained as Under Discussion.	ECC considered Norwich to Tilbury (N2T) will have extensive residual impacts that adversely affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Also, the national benefits will not offset the harm at a local level. ECC have strongly encouraged the Applicant to respond positively to the issue of social value and community benefits as set out various stages of the NSIP process particularly having regard to the Governments r published Community Funds for Transmission Infrastructure. Separately, Significant benefits should be realised from N2T for education, skills, and employment during construction and operation, alone and cumulatively with other NSIPs. With reference to ECC's Relevant Representation submission (27 November 2025), section 2 ECC's Pre-application Engagement with the Applicant **[RR-1083]** there has been little progress from National Grid on this matter. It is considered that this will be a key area of focus for ECC.	Under Discussion

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			ECC awaits the commencement of the consultation on the community benefits and will respond accordingly, seeking to elsewhere community funds are delivered, real long lasting benefits are delivered for the local communities impacted by the development. ECC would draw attention to commentary raised in response to the Rule 17 Letter dated 30/06/2026 as submitted at Deadline 6. Although it is recognised this matter is not a material consideration in the decision on the proposed project, given the importance of this issue, this matter remains Under Discussion and it hoped that there will be meaningful engagement takes place between National Grid and ECC.	
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 - 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,	ECC has been made aware by the Applicant of this change of approach to how BNG and tree replacement, together with other matters are secured. ECC has reviewed the proposed wording and will continue discussions with the Applicant on this matter.	Under Discussion

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		by requirement and not by a unilateral s106 agreement. The Applicant is committed to continue discussions with ECC, 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 necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	ECC would dispute the Applicant's position that compensation measures are not necessary. The Council considers the Project would result in significant adverse landscape and visual effects at a wide scale which need to be offset through landscape enhancement or compensation at a strategic scale. Presently, as set out in our Local Impact Report and responses to ExQ1, the application does not show how the residual significant adverse landscape and visual effects of the pylons and overhead line along the route in Essex will be compensated for along its length. The 2024 version of NPS EN-1, which is the version against which this project falls to be assessed, makes clear that Applicants for CNP infrastructure should "demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated" and that they should "set out how residual impacts will be compensated for as far as possible" (para 4.2.11-12). That is reinforced by paragraph 4.3.4 which again requires the Applicant to "show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for". The same points are reiterated in paragraph 2.1.6 of EN-5. It is	Under discussion

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			considered therefore that compensation is an inherent part of the mitigation hierarchy which needs to be applied to the Project. The Council acknowledges that paragraph 4.2.25 of the 2025 version of EN-1 (which is a material consideration) states that "compensation, by definition, does not reduce an adverse effect resulting from a development", but it does still go on to confirm that "applicants should set out how residual impacts will be compensated for as far as possible", so there is no significant shift from the position under the 2024 version of EN-1. As set out in ECC's Local Impact Report (paragraph 4.10.43**) [REP1-161**], a case exists for a strategic landscape compensation package to offset harm as far as possible in line with the mitigation hierarchy. To this end, we have been looking at ways in which this landscape and visual compensation could be delivered at a strategic level in addition to any replacement or mitigation planting. For clarity, ECC is of the opinion that the replacement planting proposed is not compensation planting, as referred to in 3.3.17 in this SoCG which refers to para 4.10.14 of ECC;s Local Impact Report **(REP1-161**) ECC would wish for this matter to remain under discussion although raises strong concern to the ExA regarding the Applicant's commentary in respect of this important compensation measure.	

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3.3 Ecology and Biodiversity

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

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

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.3.4	Assessment Methodology	National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species, including water voles have been agreed with Natural England.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement/comment. All methodologies for surveying licensable species have been agreed with Natural England The Applicant has agreed a bat box compensation strategy to resolve this issue, wording for which had been agreed with ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G]**.	The survey methods used are largely accepted, although note the comments made for ID 3.3.11. EPS confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to survey methodology for bats which requires further information and is discussed further in ID 3.3.19 of this document. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed. -	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [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	The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "*Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference*	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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 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 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 recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	*7.4))"*, is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation requirement. ECC acknowledges the Applicants position that a 5 year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), is considered sufficient. However, after further consideration, ECC considers this period of aftercare and management is insufficient and leaves open a credible possibility of a high failure rate detrimental to the quality of replacement planting.	
EIA – Baseline Conditions				
3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity**	ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		[Revision C]. The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. The Applicant has agreed a bat box compensation strategy to resolve this issue, wording for which had been agreed with ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G]**.	conditions and receptors for bats which requires further information and is discussed further in ID 3.3.20 of this document. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.9	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Draft LEMP documents have been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions to those documents. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard	Agreed

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			mitigation for bats which can be found in ID 3.3.21.	
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.21). ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
EIA – Assessment Conclusions				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [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 [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 section presents the final significance	It would be useful transparency to advise on how long it is predicted to take for the long-term neutrality to be achieved for the affected receptors. The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision. ECC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in both the impact magnitude prediction and the appropriateness of mitigation. Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys,	Agreed

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		outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [Revision D]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** includes a reasonable worst-case assessment of impacts on potential roost features. Refer to Table 4.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** for a more detailed response on bat surveys. Following a meeting in May 2026 National Grid submitted to the Local Planning Authorities a bat resource compensation proposal for consideration. This includes the provision of bat boxes/veteranisation of 10 % of the potential bat roosting features lost.. Compensation feature locations will be selected by the ECoW based on professional judgement of site suitability and the potential for greatest benefit. Full details of the bat box compensation scheme have been added	backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, "*the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees*any number of which could be classified PRF-M after further survey] *and 16 trees with hibernation features.*" As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected. The potential impact without any mitigation measures being applied is described in the ES Table 8.23: "*In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost – mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within*	

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		to **7.4 Outline Landscape and Ecological Management [Revision G].** This Matter was agreed with ECC during a call held on 11 June 2026.	*the Order Limits. Effects would be considered significant*." However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s) (i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.9, this is not considered to be a reasonably supported assessment. What is being proposed is a quasi District Level Licence-type approach for roosting bats (i.e. getting DCO without first completing surveys), when ECC is not aware of any such DLL method for bats having been trialled and approved. ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that concerns regarding the effects of construction remain and that this matter requires further discussion. Further to a meeting with the Applicant / Arcadis on 23/04/26, where ECC's position was clarified, the ongoing discourse is currently focusing on securing an agreed level of bat roost tree resource compensation. June 2026 update NG's proposal for "*the provision of bat boxes/ veteranisation of 10% of the* [potential] *bat*	

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			roosting features lost in any one Project Section", made in 19 May 2026 meeting, is broadly acceptable, although that is with the correction made to the statement above. Any actual roost features should already require compensation under the method statement of a Natural England mitigation licence. What remains to discuss, is how the bat boxes / veteranisation should be distributed to best effect. Potentially, box distribution needs to be left to an ECoW to decide after all surveys, but they should be guided by advice points included in the LEMP. As for the sharing of 8.9.1.1 Addendum to ExQ1 BIO 1.6 - **Advice Letter on bats and letters of no impediment from Natural England [REP4-307],** that is welcomed. However, ECC is not inclined to wholly agree it "…*states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed*". It appears that Natural England has made some further information requests that suggest concerns similar to those expressed by ECC. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 -**	The assessment of effects during operation (and maintenance) is considered appropriate.	Agreed

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		Ecology and Biodiversity [Revision C]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	ECC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	**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 construction impacts from the Project. The Project role and responsibilities of the various clerk of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The various Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice. These roles would be delivered by multiple individuals across the Project, depending on the specific requirement/task. As stated within the management plans the ECoW will be supported by a range of species specialists as required, this will include a bat licenced surveyor. Further detail on the multiple specific individuals undertaking these roles would be available post-consent as part of the final Landscape and Ecological Management Plan/s.	The Outline CoCP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 22 November 2024 and 19 February 2025. Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, ECC would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. ECC would also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project. B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey class licensed (level 2+ if endoscoping required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF classification. B16 – see comments for ID 3.3.9. This issue remains under review and the subject of ongoing discussion. Following a meeting with the Applicant / Arcadis on	Agreed

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		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. This matter is considered agreed by National Grid.	23/04/26, ECC believes there is common ground in the desire to ensure effective ECoW function during the construction phase of the project. At this meeting ECC and the Applicant / Arcadis agreed to consider further on a suitable description of the necessary qualifications/experience required of a ECoW. One possibility mentioned was for an Ecology Advisory Board to review (and presumably vet?) and give approval for appointed ECoWs. With more detail, ECC is not adverse to this approach in principle. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	
3.3.14	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and is appropriate. Natural England, as the primary statutory advisor and competent authority on roosting 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	The Outline LEMP has been shared with ECC. ECC review expressed no major concerns but did advise a number of clarifications and additions. See response dated 19th February 2025. With respect to paragraph 6.1.8, clarity regarding the criteria used for defining a tree's bat hibernation potential is sought? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features? ECC remains of the opinion that the evaluation undertaken is not properly acknowledging the full extent of trees with hibernation roost potential. However, ECC	Agreed

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		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 ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**	hopes this this can be addressed under the discussion concerning the compensation offering for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	
Other matters as required				
3.3.15	Biodiversity Net Gain (BNG) – Onsite and Assessment	National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. The **7.1 Biodiversity Net Gain Report [Revision B]** sets out the approach to BNG. National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025. No concerns have been raised by ECC to National Grid on the assessment approach to BNG or the	ECC would like this matter to remain Under Discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.6 is resolved. This includes clarity on the application of the mitigation hierarchy, transparent accounting to avoid double-counting, governance and monitoring arrangements, and how on-site BNG delivery aligns with the Essex Local Nature Recovery Strategy. ECC considers	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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. In response to the comments made by ECC, the Applicant has set out in the ES how the mitigation hierarchy has been applied, the Applicant has committed to avoid double counting as set out in 7.1 Biodiversity Net Gain Report [APP-299], the governance and monitoring arrangements for onsite BNG in the Environmental Areas will be detailed within the final LEMP(s) with the species mixes and final design of the Environmental Areas being guided by local context with reference to the LNRSs (paragraph 9.7.2). The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	that there must be confidence in the reinstatement planting being effective and achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur. ECC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	
3.3.16	Biodiversity Net Gain (BNG) - Offsite	National Grid will deliver at least 10% BNG with wider environmental and societal benefits on its construction projects. **7.1 Biodiversity Net Gain**	While the basic approach of the Applicant to the delivery of BNG is noted, further detail on how offsite BNG is to be delivered is required.	Under Discussion

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		Report [Revision B] sets out the approach to BNG. Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain Report [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, habitat type, habitat condition, cost and timings amongst others, including the local nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances. Updates were made to section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to reflect this. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, by requirement and not by a unilateral s106 agreement. **3.1 Draft DCO [Revision G]** has been updated. The Applicant is committed to continue discussions with ECC, which will likely conclude	In particular, location, governance, and delivery of offsite BNG must be clarified – simply indicating offsite BNG will be secured by a legal agreement and delivered through collaboration with partners is too general to allow ECC to agree. Furthermore, ECC seeks greater certainty and commitment on how offsite BNG will be spatially aligned with the Essex Local Nature Recovery Strategy, the extent to which delivery within Essex will be prioritised, the role of local delivery partners, and the mechanisms for securing long term management, monitoring, and stewardship. ECC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	

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		after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.3.17	Arboriculture Impact Assessment (AIA)	The AIA has been prepared in accordance with Appendix J of **6.19 Scoping Report - including appendices B to K [APP-296]** and is considered appropriate for this stage of the Project. The Applicant will be seeking to retain the veteran trees through their detailed design. Commitment GG14 of **7.2 Outline Code of Construction Practice [Revision G]**. 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 with the relevant Local Planning Authorities pursuant to Requirement 9 and reinstatement planting plan(s). Details of offsite planting will be provided in an Offsite Planting Delivery Scheme which is also secured by 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)	This remains Under Discussion pending agreement to proposed mitigation and compensation measures. It is recognises that these are now being secured via a requirement within the DCO – engagement is ongoing on the detail of this requirement. ECC welcomes the commitment from the Applicant for the retention of veteran trees. ECC also welcomes the commitment to 3:1 tree replacement. ECC has provided commentary direct on 13/07/2026 to the applicant on the proposed wording for the relevant DCO requirements including the seeking of relevant approvals. As raised within Paragraph 4.10.14 of ECC's Local Impact Report [REP1-161] , ECC considers that replacement planting is considered to be mitigation, whether this is delivered onsite or offsite, and not compensation planting. Due to the ongoing engagement on this topic, ECC recommends that this remains under discussion	Under Discussion

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		approved by the relevant Local Planning Authority.		
3.3.18	Data sources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated version of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. The provision of this additional data does not change the conclusions of the assessment submitted in August 2025. All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [Revision C].** The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with ECC and has been added **to 7.4 Outline Landscape and Ecological Management [Revision G].** The Applicant considers this matter Agreed.	As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending. As late November 2025, ecological surveys have been completed on all but 3% of the total land within the Order Limits. This is not considered an excessive or unreasonable omission given the overall area covered by the Order Limits and the inevitability of certain access constraints. Refer to June update in point 3.3.11 ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	Agreed
3.3.19	Survey Methodology (Bats)	The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [Revision D]**, as the primary statutory advisor and competent authority on roosting	Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, ECC believes further survey effort prior to DCO consent is feasible. Enough at-height	Agreed

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		bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** includes a reasonable worst-case assessment of impacts on potential roost features. Due to the transient nature of bat tree roosts, pre-construction surveys would be undertaken of all trees due to be lost with suitability to be used by roosting bats, to confirm the presence/absence of roosting bats, prior to felling/pruning. Where the presence of a roost is confirmed, mitigation measures, as agreed with Natural England, would be delivered under licence to ensure no impact on the favourable conservation of bats. A draft Project wide bat licence has been prepared through consultation with Natural England where likely impacts and appropriate mitigation measures for each different species and roost type likely to be encountered are given. The draft Project-wide licence has been prepared where likely impacts have been assessed and a percentage of all trees with PRFs likely to support roosting bats has been agreed with Natural England. The draft Project-wide licence sets out appropriate mitigation measures for each different species and roost type likely to be encountered and	inspection surveys should be possible to facilitate a data-based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/compensation scheme. ECC accepts the reasoning for a bespoke bat roost tree survey method. However, ECC is of the opinion that the limitations of the survey method used need to be acknowledged and reflected by a conceded degree of uncertainty in the impact assessment. That impact assessment uncertainty then needs to be counteracted by a suitably precautionary mitigation plan. ECC hopes this matter can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	

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		includes measures such as provision of bat boxes and tree veteranisation. Natural England has been consulted throughout the survey design and development of the mitigation approach as presented within the draft licence and are in support of the approach. Natural England advice related to bats is provided in **8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England [REP4-307].** This letter states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G**]. The Applicant considers this matter Agreed.		
3.3.20	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The baseline conditions and receptors presented are considered appropriate. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England [Revision C]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level	ECC is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review. ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at	Agreed

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		tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** includes a reasonable worst-case assessment of impacts on potential roost features. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G**]. The Applicant considers this matter Agreed.	Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	
3.3.21	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The bat roost survey scope was agreed with Natural England, as evidenced **within 5.9.13 Draft Statement of Common Ground - Natural England [Revision D]**, as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level	Measure B16's assumption that any action requiring a Natural England derogation licence can be "*reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit*" is considered unsound. ECC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor impacts. This is particularly relevant to the concerns stated for ID 3.3.11. ECC is of the opinion that the baseline conditions and receptors for roosting bats requires further information and review.	Agreed

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		tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** includes a reasonable worst-case assessment of impacts on potential roost features. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with ECC and has been added to **7.4 Outline Landscape and Ecological Management [Revision G]**. The Applicant considers this matter Agreed.	ECC remains of the opinion that the potential bat roost tree resource impact of the project is not appropriately recognised. However, ECC hopes this this can be addressed under the discussion concerning the compensation offer for the overall bat roost tree resource impact of the project – refer to ECC response to 3.3.11. ECC has reviewed the latest iteration of the OLEMP submitted by the Applicant at Deadline 6 **[REP6-084]** and can confirm this matter can be moved to Agreed.	

3.4 Green Infrastructure

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
Ecology and Biodiversity Matters				
3.4.1	Data sources (Ecology Matters)	The Applicant confirms that a robust evidence base, including desk-based and field survey data, was used in the environmental assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. This is considered sufficient to inform the assessment. No further data sources are going to be added to	ECC notes and accepts the Applicant's position that no further updates will be incorporated into ES Chapter 8 – Ecology and Biodiversity [AS-026]. ECC welcomes the Applicant's recognition of the value of the Essex Local Nature Recovery Strategy (LNRS) and that it will be considered in the identification and delivery of off-site BNG	Under Discussion

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		6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]. The Applicant considers the data sources within Chapter 8 are proportionate and robust. Notwithstanding this, the Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, offsite tree replanting and delivery of onsite reinstatement tree and hedgerow planting and mitigation planting in the Environmental Areas where available and appropriate to the Project's circumstances, post-consent. The Applicant also utilised the LNRS to identify opportunities within 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans, which provide an indicative example of the type of landscape and visual compensatory measures which could be delivered at certain locations. It is considered that the LNRS has be used to inform Project mitigation, compensation and enhancement where appropriate. The Applicant is committed to continue discussions with ECC, resolution of this matter is subject to detailed design. On this basis this matter is retained as Under Discussion.	sites, off-site tree replanting, and onsite reinstatement tree, hedgerow and mitigation planting, where available and appropriate. However, ECC maintains that the Applicant's response does not commit or explain whether, or how, the Essex LNRS has informed the assessment process itself, nor does it address ECC's request for the LNRS to be used more broadly as a strategic evidence layer to inform the identification and spatial alignment of mitigation, compensation and enhancement measures across the Project. ECC's original comments were not limited to off-site BNG delivery but sought recognition of the LNRS as a tool to support strategic ecological connectivity and nature recovery throughout the scheme. ECC also notes that, whilst the Applicant has referenced the LNRS within the Masterplans (Appendix D–I), its application appears limited to selected locations and does not demonstrate its use as a consistent, scheme-wide evidence layer. The opportunities identified remain indicative and high-level, with delivery subject to future engagement and agreement outside the Order Limits. ECC therefore continues to consider that the LNRS should be embedded more fully as a strategic framework for informing the spatial alignment of mitigation, compensation and enhancement measures, rather than being relied upon primarily in the context of post-consent delivery and off-site BNG.	

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			This matter is considered to need to remain under discussion as continued engagement on the points raised within this section are sought.	
3.4.2	Standard mitigation	The Applicant acknowledges ECC's request to further integrate Green Infrastructure principles within the mitigation hierarchy. The Applicant confirms that the Project has been developed in accordance with the mitigation hierarchy. The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate. Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **5.6 Planning Statement [Revision B]** confirms at paragraph 7.3.476 that the Project is able to demonstrate it has applied the mitigation hierarchy to avoid adverse impacts on open space (including Green Infrastructure) and therefore no further mitigation or compensation	ECC welcomes the inclusion of embedded and standard mitigation measures within the Outline LEMP and CoCP and notes the Applicant's confirmation that the Project has been developed in accordance with the mitigation hierarchy and is committed to supporting the aims of the Essex Green Infrastructure Strategy and Local Nature Recovery Strategy through BNG delivery, where appropriate. However, ECC considers that further integration of GI principles within the mitigation hierarchy should be demonstrated by the Applicant, ensuring that ecological, hydrological, landscape, and community functions are delivered in a coordinated and multifunctional manner. GI should be designed to maximise benefits, such as flood mitigation, biodiversity enhancement, and community wellbeing. ECC would recommend that GI corridors be aligned with existing ecological networks and PRoW to enhance connectivity and accessibility, particularly in areas of landscape sensitivity and community use. ECC welcomes the additional information provided regarding the application of the mitigation hierarchy; however, the response does not fully explain how GI principles have	Under Discussion

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		is required to fulfil paragraph 5.11.25 of National Policy Statement (NPS) EN-1 (2024). Mitigation has been identified as part of the EIA process to reduce adverse effects on the environment. Further mitigation to support GI is not considered to be required as part of the EIA process. No further mitigation is proposed for GI.	informed the design evolution of the Project or how multifunctional GI outcomes have been considered through the avoidance, minimisation and mitigation stages of the hierarchy. ECC therefore considers that its comments have been partially addressed but would welcome further discussion with the Applicant on how these issues have been captured within the Project's design evolution and mitigation approach.	
3.4.3	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **7.1 Biodiversity Net Gain Report [Revision B]** highlights that the Order Limit Hedgerows are to be enhanced to meet the minimum net gain requirement (+10 %), including native species as highlighted in **7.4 Outline Landscape and Ecological Management Plan [Revision G]**. The Applicant recognises the value of the LNRS in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRS will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain Report [Revision B]**. National Grid	Green Infrastructure delivery should be explicitly aligned with the Essex GI Strategy and Essex GI Standards and reflect the priorities identified in the Essex LNRS, ensuring that mitigation, enhancement, compensation and BNG measures contribute to wider landscape-scale recovery. ECC welcomes the Applicant's commitment to delivering hedgerow enhancement as part of the Project's BNG proposals, including the use of native species, and notes the inclusion of LNRS and local Green Infrastructure considerations within the updated OLEMP and DASSI documents. Where habitats such as hedgerows and trees are removed, ECC encourages reinstatement and enhancement using locally important native species and local seed stock, in consultation with wildlife groups across Essex. ECC continues to seek discussions be held to secure biodiversity and landscape compensation within Essex, with a preference for delivery within opportunity	Under Discussion

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		also aims to deliver biodiversity legacy within the three counties crossed by the Project (Norfolk, Suffolk and Essex). The Applicant takes NPS policy as the starting point when appraising the applicability of requests for additional benefits such as GI (and other environmental net gains) under section 4.6 of EN-1 (2024). The request to deliver as specified in the NPS is not a strict obligation on the Applicant to deliver individually but possibly holistically where opportunities arise. Such opportunities will be explored further at the detailed design stage and therefore updates have been made to key documents to confirm this commitment. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms the LNRSs will be a key part of the site selection criteria for offsite BNG. The Applicant has also added a further design principle on Local Nature Recovery Strategies and Local Green Infrastructure in **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP5-166]** to guide detailed design. National Grid remains in detailed discussions with Suffolk Wildlife Trust regarding the Waveney and Little Ouse Recovery (WaLOR) project which is in the same geographic area as the Project. National Grid is looking to potentially reserve up to 600 biodiversity units, which is a significant proportion of the biodiversity units estimated to be required. Essex Wildlife Trust has also been engaged in relation to the delivery of offsite BNG. Mitigation has been identified as	areas identified in the Essex LNRS. Whilst ECC welcomes the Applicant's commitment to consider LNRS priorities in the identification and delivery of off-site BNG and notes ongoing engagement with Essex Wildlife Trust, the location and delivery mechanism for compensation and enhancement measures within Essex remain to be confirmed. To ensure long-term ecological benefits, ECC also encourages the establishment of stewardship agreements with local wildlife groups such as Essex Wildlife Trust, ECC, Place Services, and relevant Local Authorities. ECC also awaits further details from the Applicant regarding the procurement and delivery process for securing BNG units, including how LNRS priorities and opportunities for wider Green Infrastructure benefits will be taken into account.	

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		part of the EIA process to reduce adverse effects on the environment. Further mitigation to support GI is not considered to be required as part of the EIA process. No further mitigation is proposed for GI.		
3.4.4	Outline LEMP	The Applicant acknowledges ECC's request to extend the monitoring period for landscape to 10 years and to secure a 30-year management period for BNG and associated GI. The Applicant confirms that a five-year monitoring period for tree and hedgerow planting is proposed. This is considered sufficient to demonstrate successful establishment and is consistent with the approach taken on other recent NSIPs, including those promoted by National Grid. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [Revision B].** The Applicant considers that this combined approach ensures both effective establishment of mitigation and delivery longer-term environment benefits. The Applicant will continue to engage with ECC on the detail of management proposals; however, the proposed monitoring period is considered appropriate. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement**	ECC welcomes the Applicant's commitment to a 30□year management and maintenance period for Biodiversity Net Gain and associated Green Infrastructure within Environmental Areas but seeks clarity on the governance and long-term monitoring arrangements for green infrastructure and BNG delivery. ECC recommends that the Outline LEMP include a robust monitoring framework incorporating adaptive management provisions and opportunities for stakeholder engagement to ensure the longevity and effectiveness of Gi and BNG measures. ECC recommends that the BNG delivery is clearly cross referenced within the Outline LEMP, supported by a transparent monitoring framework, including adaptive management provisions and community engagement. ECC recommends extending the monitoring period for landscape (GI) delivery to 10 years, in line with best practice demonstrated by other NSIPs including Five Estuaries and North Falls Offshore Wind Farms. ECC considers that the proposed monitoring period could be structured into two phases: comprising an initial 5-year period of high-frequency establishment monitoring, followed	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Chapter 8 - Ecology and Biodiversity [Revision B]). The Applicant notes that ECC (in **Written post-hearing submissions; summaries of and responses to oral submissions made at hearings held during week commencing 27 April 2026 [REP4-328]**) welcomes the updates made in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** related to 'governance arrangements, monitoring and aftercare (including long-term management for BNG Environmental Areas), adaptive management, stakeholder engagement mechanisms, and the distinction between mitigation, enhancement and compensation, with appropriate cross-referencing to the Biodiversity Net Gain Report'. It is recommended that these issues are identified as Agreed, with the point on the duration of the management and monitoring (aftercare) period remaining under discussion at this time. Detail on habitat management and monitoring for the Environmental Areas will be set out in the final Landscape and Ecological Management Plan(s) post consent.	by a further 5-year period of lower-frequency development monitoring, to demonstrate successful long-term establishment and functionality. In that the monitoring framework incorporates a degree of flexibility, such that where establishment criteria have not been fully achieved within the initial 5-year period, the enhanced maintenance and high-frequency monitoring regime should continue on a rolling basis until satisfactory establishment is demonstrated. This would ensure that landscape and GI features are not transitioned prematurely into a lower-intensity management phase before they are resilient and self-sustaining, thereby securing the intended long-term environmental and functional benefits. ECC would wish to see a response from NGET on this proposal and therefore this matter remains under discussion.	
3.4.5	Biodiversity Net Gain (BNG)	The Applicant acknowledges ECC's request to adopt a higher figure than the minimum 10 % BNG. While there is no current legal obligation for BNG on NSIPs, the Applicant's approach to BNG has been to meet the policy requirements within the national policy statements, deliver its corporate commitments of at least 10 % BNG	ECC supports the commitment to deliver at least 10% BNG. The Essex Local Nature Partnership (including LPAs) is working towards a coordinated approach to BNG and encourages applicants to explore	Under Discussion

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		with wider benefits, maximise the benefits and value from consumer-funded BNG and to follow the spirit of the Town and Country Planning Act 1990 BNG legislation and guidance including using the Statutory Biodiversity Metric. The Applicant recognises the value of the LNRSs in guiding future habitat enhancement and restoration opportunities. The Applicant detailed in its response to ExQ1 BIO 1.38 how the Environmental Areas/onsite BNG will align with the goals and opportunities set out in the relevant LNRSs, see 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. The Applicant also confirms that the LNRSs will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances, as set out in **7.1 Biodiversity Net Gain Report [Revision B]**. The final Landscape and Ecological Management Plan(s), which will require approval from the relevant planning authorities, will include habitat monitoring and management plans for each of the Environmental Areas.	opportunities to exceed the statutory minimum where feasible. ECC and the Essex Local Nature Partnership's *Viability Assessment of Biodiversity Net Gain in Essex* (February 2025) indicates that higher levels of BNG may be achievable in some cases. However, it also highlights specific challenges for linear Nationally Significant Infrastructure Projects (NSIPs). In this context, National Grid is encouraged to explore opportunities to maximise BNG, including consideration of higher targets where practicable. ECC encourages National Grid to demonstrate how the Local Nature Recovery Strategy (LNRS) has informed the identification and delivery of offsite BNG, ensuring alignment with strategic ecological networks and priority areas. Offsite BNG proposals should be developed collaboratively with local stakeholders and LNRS delivery partners to maximise long-term ecological value. Further detail is requested on how LNRS mapping and priority habitats have influenced site selection and the design of BNG interventions. Transparent accounting should clearly distinguish between mitigation, enhancement, and compensation to avoid double-counting. ECC recommends that BNG delivery is supported by a Habitat Management and Monitoring Plan. This should be secured as	

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			part of a biodiversity net gain requirement through the Development Consent Order, to ensure biodiversity gains are implemented, monitored, and maintained for a minimum of 30 years in line with best practice. Discussions are ongoing regarding BNG and how this is secured.	
Landscape and Visual				
3.4.6	Embedded mitigation (Landscape and Visual)	The Applicant acknowledges ECC's recommendation to use GI as a key component of landscape mitigation. The Applicant takes NPS EN-1, and other national policy, as a starting point when considering opportunities to deliver additional environmental benefits, including GI. While the NPS provides strong support for the delivery of such benefits, these are considered in a proportionate and holistic manner, considering the specific characteristics and constraints of the Project. The Applicant confirms that wider environmental and societal benefits will be considered and reported on in the Biodiversity Net Gain Report, delivered post-consent. The Applicant recognises the value of the LNRSs in guiding future habitat enhancement and restoration opportunities. The Applicant confirms that the LNRSs will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances. Updates were made to	ECC recommends that Green Infrastructure be used as a key component of landscape mitigation, particularly in areas of high visual sensitivity and community use. ECC supports the use of planting and habitat creation to soften visual impacts and enhance landscape character, and requests that GI proposals be aligned with LNRS priorities and local landscape strategies. ECC would welcome the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, and would refer to commentary raised at 3.4.1	Under Discussion

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		section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to reflect this. 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 [Revision B]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project.		
3.4.7	Additional mitigation (Landscape and Visual)	The Applicant acknowledges ECC's recommendation to explore a range of compensation measures to offset the impacts of the Project and deliver BNG. The Applicant's BNG approach seeks to ensure that biodiversity creation and enhancement is delivered in the right places for nature, is aligned policy, and managed appropriately. The Applicant is committed to achieving wider strategic outcomes at the local level through BNG commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and LNRS where applicable and appropriate. The Applicant recognises the value of the LNRSs in guiding future habitat enhancement and restoration opportunities. The Applicant	ECC notes that significant residual landscape and visual impacts remain. ECC recommends that National Grid explore a range of compensation measures to offset the impacts of the proposal and deliver net environmental gain. These should include the enhancement of existing GI assets, investment in community-led landscape initiatives, and the creation of new accessible, high-quality GI open spaces across Essex. Such measures would contribute to improved environmental outcomes and support the wider objectives of nature recovery and community wellbeing. Discussions have taken place with Place Services, Essex Wildlife Trust, the Biodiversity Net Gain (BNG) Officer, and the Local Nature Recovery Strategy (LNRS) Coordinator to	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		confirms that the LNRSs will be considered in the identification and delivery of offsite BNG sites, where available and appropriate to the Project's circumstances. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The Applicant has committed to a 3:1 replacement for individual trees and trees within small groups. The Project will prioritise the replanting for individual trees and small groups of individual trees within the Order Limits, offsite provision may however be required and will align with the relevant LNRSs as far as practicable. Updates were made to section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to reflect this. Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** sets out the Applicant's approach to the mitigation hierarchy for the Project. The Applicant's position on landscape mitigation and compensation is also set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030];** Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**; and most recently during in the Applicant's Oral Summary of Case for Issue Specific Hearing 4.	explore opportunities for securing potential compensation measures and financial contribution within Essex. ECC recommends securing off-site compensation within Essex, ideally in LNRS strategic habitat opportunity areas, and establishing long-term stewardship agreements with wildlife groups across Essex such as Essex Wildlife Trust, and ECC and other Local Authorities. ECC would also the opportunity for further discussion to explore how the Essex LNRS could be referenced as a supplementary strategic evidence layer, as referred to in 3.4.1. ECC would refer to its commentary on compensatory planting at 3.2.14.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.4.8	Outline LEMP (Landscape and Visual)	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate. The Applicant's position on landscape compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030**] and most recently during in the Applicant's Oral Summary of Case for ISH4. There has been no change in approach or shift in terminology from essential mitigation (necessary to further reduce significant environmental effects) to compensation (does not reduce or overcome an adverse effect) in **7.4 Outline Landscape and Ecological Management Plan [Revision G]**.	In respect of Green Infrastructure: ECC notes that changes in the OLEMP terminology from "enhanced mitigation" to "landscape compensation" require clarification to ensure these are not repurposed mitigation measures, risking double-counting. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence. ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions and would welcome ongoing discussions with the Applicant on landscape compensation proposals. ECC would refer to its commentary on compensatory planting at 3.2.14.	Under Discussion

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3.5 Contaminated Land, Geology and Hydrogeology

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Approach and Methods				
3.5.1	Study area	The study area was agreed through **6.19 Scoping Report [APP-288** to **APP-296]** and **6.20 Scoping Opinion [APP-297]** Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.2	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	ECC confirmed on 17 October in the review of the Statement of Common Ground that this matter has been appropriately dealt with therefore the status has been changed to agreed.	Agreed
EIA – Assessment Conclusions				
3.5.3	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate. National Grid has considered these potential future mineral extraction sites as part of project development, including a revised design following consultation. This is addressed in the **5.15 Design Development Report [Revision B]**, para 6.5.31. The Applicant is engaging with SRC Group regarding both the existing Sheepcotes site and	ECC's **LIR [REP1-161] and ECC's** response to the ExQ1 MW1.1 & MW1.2 **[REP3-078]** sets out the Councils position regarding the safeguarding of mineral deposits The Applicants Minerals Resource Assessment (APP-183) at Paragraph 9.5.17 confirms that the Order Limits and Study Area overlap with several Candidate sites that have been submitted for future allocation under the MWPA's Call for Sites for the emerging Essex Minerals Local Plan. ECC recognises that engagement between the Applicant and existing and Candidate Site promoters is ongoing with discussions focussing on potential route variations to	Under Discussion

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		the two new locations of mineral sites being Martells (A85 and A86) and Crown Quarry captured in **8.3.28 Draft Statement of Common Ground – Martells Mineral Site A85 & A86 [REP4-235]** submitted at Deadline 4. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	minimise or eliminate the sterilisation of permitted reserves, including alternative routes where Candidate Sites may be allocated as part of the ongoing Minerals Local Plan Review. As these discussions are ongoing, and the MWPA have not been provided with any finalised alternative route options, ECC cannot yet take a final view on potential impacts on the deliverability of existing allocations or Candidate Sites. As a result, this matter must remain Under Discussion. ECC is committed to continue discussions with the Applicant,. On this basis this matter is retained as Under Discussion.	

3.6 Health and Wellbeing

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

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

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

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

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Technical Note – Refreshed Approach in October 2024. ECC's response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025. National Grid can confirm that the baseline section of the ES chapter includes reference to the Index of Multiple Deprivation (IMD). **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP6-053]** has been updated with IMD 2025 data and submitted at Deadline 6. The approach to defining ward sensitivity has used a variety of baseline data, including the IMD but also other health-related indicators. National Grid can confirm that published local position statements such as the Essex Joint Health and Wellbeing Strategy have been included within **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**.	Deprivation', will this look at the overall measure of deprivation along the route or will it focus domains of deprivation as part of defining sensitivity. ECC confirmed in an email dated 30 January 2026 from the public health team that this matter has been resolved and the position can be agreed.	
3.6.4	Assessment methodology	A meeting was held on 24 September 2024 to agree the assessment methodology of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C].** Comments were received on the Technical Note from ECC on 01/11/2024 and a response was provided in May 2025. Comments made by ECC in their relevant representation are noted, and National Grid will continue to engage with ECC on this matter. National Grid's position to each of the points	As part of the Statutory Consultation, ECC Public Health highlighted the need for a more robust health impact assessment and the need for National Grid to focus on actively driving out maximum local benefits to the health and wellbeing of communities across Essex. Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161]** and Written responses [**REP2-023, REP2-030** and	Agreed

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		raised is as follows: • A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. • **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** contains an assessment of impacts on vulnerable groups. Vulnerable groups considered in the assessment are identified in Table 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. National Grid provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	**REP2-029]**, this issue can be moved to agreed.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. The key parameters and assumptions presented are considered appropriate. National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach in October 2024. ECC's response to the technical note was received in November 2024. National Grid responded to ECC's comments on the technical note in May 2025. In relation to the points raised in ECC's relevant representation dated 27 November 2025: • The assessment undertaken in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** reported the available IMD data at the time (i.e. 2019) in order to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. We have also reviewed deprivation data for the health deprivation and disability domain at LSOA level, as set out in paragraph 10.5.18 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. A review of the updated IMD data published in October 2025 (after the DCO application was submitted) shows that, for Greater Essex, more people are living in deprived areas in 2025 than was the case in 2019 (although for some areas such as Colchester, deprivation levels do not	Key parameters presented in the PEIR are considered appropriate at a population level, consideration of vulnerable groups and the application of a precautionary principle. As with the revised health and wellbeing approach, use of the Welsh Health Impact Assessment Support Unit (WHIASU) guidance is recommended to inform the identification of vulnerable population groups is recommended. The refreshed approach to Health and Wellbeing should be referenced here. ECC provided the following details in their relevant representation dated 27 November 2025: • The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation— particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1	Agreed

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		appear to have changed significantly over the same time period). It is not considered that the updated dataset would result in material changes to the conclusions of the Health and Wellbeing assessment; impacts on vulnerable populations (which includes people both within and outside of deprived areas) have already been taken into account in the assessment. • The Applicant submitted **8.16 Health and Wellbeing and Socio-Economics Recreation and Tourism Technical Note [REP4-317]** which reviewed the findings of IMD 2025 against 2019 IMD and used LSOA level data to understand whether there has been any changes in localised deprivation over time. **8.16 Health and Wellbeing and Socio-Economics Recreation and Tourism Technical Note [REP4-317]** presented the summary assessment of the implications of the new data for **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. • **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** have been updated with new IMD 2025 baseline information (which includes LSOA-level data) and	requirement to identify how developments may impact populations differently. **May 2026** ECC notes National Grid's acknowledgment that the 2025 IMD update shows that for Greater Essex, more people are living in deprived areas in 2025 than in 2019 . A meeting held with the Applicant on 23.04.2026 confirmed a supplementary section of the ES is to be provided for further review June 2026 This is currently being reviewed. June 2026 A supplementary technical note (EN020027) has provided for additional information for ES chapter 10 (Health and Wellbeing) comparing and presenting technical analysis of 2019 and 2025 deprivation (IMD) data confirming that changes do not materially alter the sensitivity or assessment outcomes. This matter can be moved to agreed. ECC confirmed via email on 30th June 2026 that this matter can be considered agreed following review of the Technical note issued on 11th June 2026.	

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		submitted at Deadline 6 in response to requirements of the ExA's Rule 17 letter **[PD-019]**.		
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. The baseline conditions and receptors presented are considered appropriate. ECC comments are noted, and NG will continue to engage with ECC on this matter. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to IMD data has been addressed earlier in relation to ID 3.6.5 and is not repeated here. • The point relating to the Joint Health and Wellbeing Strategy has been addressed earlier in relation to ID 3.6.1 and is not repeated here.	Following a review of the Applicants' response to ECC's RR **[RR-1083],** LIR **[REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Embedded measures relevant to the Health and Wellbeing Chapter which are intrinsic to and build into the design of the project are considered appropriate and adequate. **May 2026** ECC acknowledges National Grid's commitment to add additional wording to the Outline CoCP. Appendix E **[**APP-305**]**	Agreed

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		In relation to points raised in ECC's relevant representation dated 27 November 2025: • No significant health and wellbeing impacts have been identified in the assessment set out in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through making timely design decisions and engaging with the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through the use of a dedicated project phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. In recognition of concerns relating to anxiety and uncertainty about the scale and duration of construction, the Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. Commitments GG36 and GG37	requiring a detailed Communications Strategy to be put in place for the duration of the construction phase. This matter can be moved to agreed, subject to confirmation that the Communications Strategy requirement in the final CoCP will explicitly require: (a) advance notification of disruptive activities to affected communities; (b) a formal complaints handling process with defined response times and escalation routes; and (c) accessible communication options for residents experiencing digital exclusion (paper copies, community notice boards). June 2026 Summary of mitigation relevant to health and wellbeing have been provided by Applicant. This includes commitment GC16 (complaints procedure), GC30 (Community liaison), GC36 (communications strategy). This matter can be moved to agreed. ECC confirmed via email on 30th June 2026 that this matter can be considered agreed following review of the Technical note issued on 11th June 2026.	

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		have been added to **7.2 Outline Code of Construction Practice [Revision G]**. Commitment GG36 secures the preparation of a detailed Communication Strategy, including the approach to community liaison, as part of the final Code of Construction Practice. The detailed Community Strategy will cover activities such as those identified by ECC including advance notification of disruptive activities to affected communities; and the approach to accessible communication options for residents. Commitment GG37 relates to development of a robust and accessible complaints procedure. Further detail on the complaints procedure have been submitted at Deadline 6.		
3.6.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to health and wellbeing monitoring has been addressed earlier in relation to ID3.6.7 and is not repeated here. A number of the measures requested by ECC have already been included in the submission	**May 2026** ECC note that standard mitigation for health and wellbeing relies on commitments distributed across multiple ES Chapters (Air Quality, Noise and Vibration, Traffic and Transport) rather than being consolidated in Chapter 10. This makes it difficult to assess whether the totality of health-protective measures is adequate. ECC has requested that the final CoCP include a dedicated section on health and wellbeing mitigation. This section should consolidate all health-relevant commitments, including noise management, dust suppression, PRoW management, and community liaison, and cross-reference monitoring framework.	Agreed

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		documents. Examples include good practice relating to dust suppression as set out in **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]**. **6.7 Environmental Statement Chapter 7 – Air Quality [Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [Revision B]** conclude that with appropriate application of dust mitigation there would likely be no significant effect to human health from construction dust. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]** includes the assessment of the potential impacts of the Project including changes in traffic flow, delays, road safety and impact on walking, cycling and horse-riding modes on the roads along the Primary Access Routes located in the Local Road Network that would access the haul roads to construction sites. **7.11 Transport Assessment [APP-333]** examines capacity, safety and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Within the assessment of the relevant Environmental Statement chapters and the Transport Assessment, mitigation measures are proposed to minimise likely adverse impacts. At the meeting held 23.04.2026, the Applicant committed to providing ECC with a document which summarised those commitments within **7.2 Outline Code of Construction Practice**	At a meeting held 23.04.2026, the Applicant confirmed that a dedicated health and wellbeing section will be developed bringing together key commitments from other technical chapters. This matter can be moved to agreed, upon receipt of written confirmation within the oCoCP. June 2026 ECC welcomes the document providing summary of mitigation relevant to health and wellbeing outlining commitments from various technical areas. This matter can be moved to agreed. ECC confirmed via email on 30th June 2026 that this matter can be considered agreed following review of the Technical note issued on 11th June 2026.	

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		[Revision G] which are of relevance to health; creating a new section within the OCoCP would be duplicative. This document has since been provided to ECC and is intended to provide reassurance that the totality of health-protective measures is adequate.		
3.6.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. ECC comments are noted, and NG will continue to engage with ECC on this matter. In relation to points raised in ECC's relevant representation dated 27 November 2025: • The point relating to IMD data has been addressed earlier in relation to ID 3.6.7 and is not repeated here. At the meeting held 23.04.2026, the Applicant committed to providing ECC with a document which summarised those commitments within **7.2 Outline Code of Construction Practice [Revision G]** which are of relevance to health; creating a new section within the OCoCP would be duplicative. This document has since been provided to ECC and is intended to provide reassurance that the totality of health-protective measures is adequate.	**May 2026** The point relating to mitigation is addressed above in relation to matter 3.6.8. June 2026 The point is addressed above 3.6.8. The matter can be moved to agreed. ECC confirmed via email on 30th June 2026 that this matter can be considered agreed following review of the Technical note issued on 11th June 2026.	Agreed

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EIA – Assessment Conclusions				
3.6.10 a	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. The assessment of effects during construction presented is considered appropriate.	It is noted that mental health and wellbeing may also be impacted by residents experiencing anxiety in relation to air quality effects. However, with the mitigation measures identified, the residual effects of the Project in relation to Health and Wellbeing for both the general population and for vulnerable groups is considered to be neutral and not significant. This will need to be informed by the refreshed approach to health and wellbeing assessment in the revised technical note. It is also noted that mental health and wellbeing may be impacted in relation to effects on visual amenity during construction. However, effects are considered to be temporary, and the location of impacted population would change throughout the construction period due to the linear nature of the Project. Relevant mitigation includes community liaison measures to inform residents of construction activities. As noted in the revised health and wellbeing technical note, the effects would need to assess sensitivity of receptors across the linear project, magnitude of effect in relation to mental health and wellbeing. This should also include qualitative assessment of the anticipated mental health and wellbeing impacts as noted within the revised approach and should provide the	Agreed

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			opportunity to input qualitative information to co-produce mitigation measures to offset the anticipated mental health impacts from the project which is one of the listed protective factors within the assessment "facilitating participation". It is noted preliminary residual effects of the Project in relation to Health and Wellbeing is potentially negative during construction due to changes in travel choice and potential effects on journey times and distances in particular for those accessing healthcare facilities. Though considered to be not significant, further assessment and mitigation measures should be provided in the ES according to the revised health and wellbeing assessment approach. May 2026 Following meeting held with the Applicant on 23.04.2026 and a review of the Applicants' response to ECC's RR [**RR-1083]**, LIR **[REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.10 b	Construction effects	In relation to points raised in ECC's relevant representation dated 27 November 2025: • **5.1 Consultation Report [Revision B]** sets out the approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom	ECC provided the following details in their relevant representation dated 27 November 2025: EN-1 emphasises the need to assess potential impacts on vulnerable groups within society. The ES baseline data acknowledges that sections of the population along the project corridor do not speak English as their	Agreed

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		English may be a second language. The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation (SoCC), giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means. Appendix E - Community Engagement and Public Information of **7.2 Outline Code of Construction Practice [Revision G]** sets out the communications channels and approach to community engagement during the construction of the Project, including the approach to engaging with local communities.	main first language, yet this vulnerability has not been considered within the sensitivity assessment or mitigation planning. Communities with limited English proficiency may face barriers to understanding consultation materials, receiving construction updates, or engaging with health information - leading to heightened anxiety and exclusion from mitigation measures. ECC recommends that the Applicant adopt inclusive engagement methods, including translated materials, interpreters, and collaboration with local community and faith organisations. These measures would align with EN-1's requirement to take opportunities to promote local improvements to encourage health and wellbeing, especially for groups who may be differentially affected by the development. **May 2026** Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161]** and Written responses [**REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.10 c	Construction effects	• We recognise that people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** includes a specific assessment of the impacts of the Project on	ECC provided the following details in their relevant representation dated 27 November 2025: • EN-1 (paragraph 4.4.5) requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Many Essex communities, particularly in Tendring, will experience	Agreed

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		mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. Paragraph 17.5.47 identifies that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. • We understand that uncertainty while the Project is developed may cause anxiety. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including use of a dedicated phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. Impacts on community safety (traffic) have been assessed in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** in relation to the potential for increases in traffic on the road network which could increase risk to users of the roads, including pedestrians and cyclists. Impacts associated with reduced active travel have been considered in relation to physical activity and the potential for disruption	overlapping NSIPs and growth schemes. The ES does not sufficiently consider the compounded psychological stress of multiple construction projects and landscape change. 32 6.8.10. ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed **May 2026** Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	

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		to PRoWs or areas of open space which may affect opportunities for physical activity. Health impacts associated with amenity loss from construction activities (noise and dust) are described in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** paragraphs 10.7.12 to 10.7.20 and 10.7.3 to 10.7.11 respectively; health effects arising from changes in accessibility to social infrastructure are set out in paragraphs 10.7.47 to 10.7.62); health effects arising from disruption to walking and cycling routes and areas of open space during construction are described in paragraphs 10.7.86 to 10.7.187. No significant effects have been identified for health and wellbeing in relation to these aspects.		
3.6.11 a	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C].** Chapter 10 sets out the assessment of impacts as they relate to both physical and mental health and wellbeing, noting that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would bring **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** identifies that, whilst there are likely to be individuals who experience adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately	Health and Wellbeing Chapter: Significant negative effects on landscape character during operation (and maintenance) are predicted to extend across the draft Order Limits and the surrounding landscapes within approximately 0.5 km to 1 km of the project. Similarly, significant negative effects on views and visual amenity during operation (and maintenance) are predicted to be experienced within approximately 1 km to 2 km of the project and these are likely to be experienced by a range of visual receptors including residents, road users and recreational receptors. It is understood that response of the local communities to these aspects are subjective, and effects are likely to be	Agreed

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		affect health deprived populations. This draws on findings presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision C]** and specifically the conclusions within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126, REP5-128, REP5-130, REP5-132 and REP5-134]** which finds no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live. It is noted within the Residual Visual Amenity Assessment (RVAA) that some properties / property groups do come close to this threshold and that mitigation measures have been recommended to reduce effects	experienced by a proportion of the local population due to how the Project may impact setting of homes, businesses and or culturally or ecologically important community assets. Further assessment undertaken and presented in the ES should also draw from the mental health and wellbeing assessment approach within the refreshed approach to health and wellbeing assessment technical note which will include a qualitative aspect. **May 2026** Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161**] and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	
3.6.11 b	Operational (and maintenance) effects	In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [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. The Applicant will work constructively with Local Authorities and local partners to understand	As part of the Statutory Consultation, ECC Public Health highlighted the need to consider how significant negative impacts could be off set through positive community benefits for local communities within Essex, such as funding for community energy schemes, training, and skills investment within the local area for those adversely affected by the Project particularly in areas with high levels of deprivation. There is the opportunity to push for the creation of accessible green spaces providing benefits for health and wellbeing and enhancing biodiversity and local nature recovery.	Agreed

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		priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. With regards to visual effects, the LVIA presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most landscape and visual receptors within the study area are static, and so will experience effects across the more localised areas explained in the LVIA. For example, a recreational receptor within a certain park or street will only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the project as a whole. The total visual effects of the project as a whole will be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case landscape character areas or types). Again, they will not typically be experienced as a	**May 2026** Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	

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		whole, but the total effect on landscape character can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and is appropriate for managing construction impacts from the Project. The Applicant provided a response to this matter at Deadline 1 through **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has further updated **7.2 Outline Code of Construction Practice [REP2-014]** at Deadline 3 with additional wording relating to the requirement for a detailed Communications Strategy as a result of community anxiety and uncertainty about the scale and duration of construction activities.	Health and Wellbeing Chapter: Note comments above for embedded, standard and additional mitigation measures which are applicable to the CoCP. Table 5.1 in the CoCP to include a section for construction and operation phase management phase in relation to health and wellbeing taking account of the refreshed approach to health and wellbeing assessment approach. This is currently referred to in section 5.1.11 of the outline CoCP has not been provided its own section in table 5.1. Refer to our Relevant Representation dated 27 November 2025 **[RR-1083]**. **May 2026** Matter addressed above at 3.6.8 Following a review of the Applicants' response to ECC's RR [**RR-1083],** LIR [**REP1-161]** and Written responses **[REP2-023, REP2-030** and **REP2-029]**, this issue can be moved to agreed.	Agreed

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3.7 Historic Environment

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

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

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		with **6.19 Scoping Report [APP-288 – APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [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 change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The Applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.		
EIA – Approach and Methods				
3.7.3	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

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3.7.4	Data sources (Built Heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [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. **Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP1-063, REP1- 064, REP4-125 and REP4-126]** is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.	ECC (Built Heritage) confirm that this matter is agreed.	Agreed
3.7.5	Data sources (archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].**	ECC has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026).	Agreed

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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 overall geophysical survey. area and the area of intrusive impact for the Project. The results of the Phase 2 geophysics fieldwork that has been completed up to the 17 April 2026 was submitted into Deadline 6 (7.7.26) of the Examination. This would then represent a combined total of 92% (approximately 2050ha) of the overall geophysical survey area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas (approximately 3000 trenches) at the point of submission of **Supplementary Environmental Information [AS-068 to AS-083].** The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork was largely completed in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination 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	ECC notes the fieldwork proposed prior to application has not been completed. It is understood that the outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has been provided by the Applicant to inform an appropriate assessment of the proposed development. June 2026. It is acknowledged that the Applicant has continued to complete further geophysical and trial trench evaluation during the examination period. Further reporting has also been submitted. However not all of these areas have benefited from assessment and analysis and full reporting. ECC maintain that the evaluation fieldwork would need to be completed and full reports received to constitute sufficient survey data to assess the impact on archaeological and geoarchaeological remains within the development area. ECC advised that this matter can be considered agreed during a call held on 22.6.2026.	Agreed

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		by the Planning Inspectorate and the Secretary of State. Assessment or interim reporting has been completed for all of the priority evaluation areas for which access was possible. The results of those reports received since the submission of supplementary environmental information in January 2026 have been reviewed against the existing historic environment baseline and assessment (**6.11 Environmental Statement Chapter 11 - Historic Environment - Clean Version [Revision D]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**) and there are no changes. The results of the phase 2 geophysical survey and supplementary historic environment baseline and assessment have been submitted at Deadline 6 (**6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**). The Applicant therefore considers that an appropriate amount and level of detail of baseline information has been provided to inform examination.		
3.7.7	Assessment methodology (Built Heritage)	The methodology for assessing Historic Environment 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 position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation) above.	Email 4 Nov 2024 - Built heritage – consultant's methodology not agreed, and all assets affected not identified. ECC (Built Heritage) is in agreement with this matter.	Agreed

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3.7.8	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	ECC is in agreement with this matter.	Agreed
3.7.9	Key parameters and assumptions (Built Heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11-Historic Environment [Revision D]**. The key parameters and assumptions presented are considered appropriate. February 2025, the Applicant issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic. March 2025, the Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.	ECC (Built Heritage) is in agreement with the matter following review of the ES.	Agreed
3.7.10	Key parameters and assumptions (Archaeology)	The fieldwork undertaken to date (see response to 3.7.6) comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to 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-**	ECC notes the fieldwork proposed prior to application has not been completed. It is understood that the outstanding fieldwork will not be completed to provide sufficient information on below ground heritage assets before the end of the examination. ECC cannot therefore agree that sufficient archaeological; survey data has been provided by the Applicant to inform an appropriate assessment of the proposed development June 2026. It is acknowledged that the Applicant has continued to complete further	Agreed

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		Historic Environment [Revision D] and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [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 in place through Requirement 5 of **3.1 Draft DCO [Revision G]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [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 [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 in **8.8.2**	geophysical and trial trench evaluation during the examination period. Further reporting has also been submitted. The key parameters and assumptions are considered appropriate for the areas of the route that have been evaluated through intrusive methods, however not all of these areas have benefited from assessment and analysis and full reporting. The AMS-OWSI provides details on how this will be addressed post consent. At present the AMS-OWSI is not agreed and it is essential to have agreement on this control document to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. We will continue to work with the Applicant to reach agreement on the AMS-OWSI. ECC advised that this matter can be considered agreed during a call held on 22.6.2026.	

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		Applicant's Comments on Local Impact Reports [REP2-030]. Assessment or interim reporting has been completed for all of the priority evaluation areas for which access was possible. The results of those reports received since the submission of supplementary environmental information in January 2026 have been reviewed against the existing historic environment baseline and assessment (**6.11 Environmental Statement Chapter 11 - Historic Environment - Clean Version [Revision D]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and there are no changes. The results of the phase 2 geophysical survey and supplementary historic environment baseline and assessment have been submitted at Deadline 6 (**6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**). The Applicant therefore considers that an appropriate amount and level of detail of baseline information has been provided to inform examination. An updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** was updated in response to comments from EPS and submitted at Deadline 5.		

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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 [Revision D]**. The baseline conditions and receptors presented are considered appropriate February 2025, The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic. Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).	ECC (Built Heritage) is in agreement with this matter.	Agreed
3.7.12	Baseline conditions and receptors (Archaeology)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**. The baseline conditions and receptors presented are considered appropriate. February 2025, The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.	ECC agreed this matter during call in January 2026.	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 [Revision D]**. Embedded mitigation is considered appropriate and	ECC (Archaeology) agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		adequate, in terms of its nature and scale, to address potential effects. The evaluation of the 400 kV underground cable is complete and reporting for the final areas completed in 2026 is underway. No significant areas of archaeology have been identified that were not already included in baseline and assessment.	most relevant in areas of underground cable where there will be an impact on archaeological remains. Further time is needed to review **5.15 Design Development Report [APP-122]** but we note this refers only to changes requested to the route alignment which were made before the final ES. As a result, and noting the intrusive archaeological fieldwork proposed prior to application is unlikely to be completed, before the end of the examination, ECC cannot agree that sufficient archaeological survey data will have been provided by the Applicant to inform an appropriate assessment of the proposed development. (June 2026)While it is acknowledged that further evaluation, including geophysics and trial trench evaluation, has been completed and further reporting has been received there remains areas of the project where the embedded mitigation is not sufficient to determine the impact on significant archaeological and geoarchaeological remains along the route, specifically within the Stour Valley and relating to the undergrounding across the river. Until full archaeological and geoarchaeological evaluation are completed in these areas and full reports produced it is not possible to determine if embedded mitigation has been successful in avoiding or reducing significant	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			effects on the archaeological and geoarchaeological resource. ECC advised that this matter can be considered agreed during a call held on 22.6.2026.	
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 [Revision D]** and set out in the **7.2 Outline Code of Construction Practice [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 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 [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,	This matter is agreed with regards to commitment H06.	Agreed

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		consultation with Local Planning Authorities and heritage specialists Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.		
3.7.14 b	Standard mitigation (Built Heritage H07)	Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and Vibration [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 of **7.2 Outline Code of Construction Practice [Revision G]** 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].**	Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) ECC would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects. This matter was agreed during a call on 23.06.2026, regarding a contact mechanism for vibration effecting built heritage.	Agreed

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		As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [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 Construction Practice [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 [Revision D]** and set out in the **7.2 Outline Code of Construction**	ECC (Archaeology) agreed this matter during call held January 2026.	Agreed

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		Practice [Revision G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.7.16	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** which was submitted at Deadline 5.	The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation. ECC noted during call in January 2026 that this matter is not relevant for Built Heritage. This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** which is scheduled for submission at Deadline 5 June 2026. The revised AMS-OWSI has been received. Comments have been provided direct to the Consultant. At present the revised AMS-OWSI is not agreed and it is essential to have agreement on this control document to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology. EPS Archaeology confirmed on 14th July 2026 that this matter can be considered agreed.	Agreed

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

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		maintenance) presented is considered appropriate. The Applicant submitted Limit of Deviation (LoD) visualisations at Deadline 5 in response to ISH2 Action Point 25, in **8.4.12.1 Response to ISH2 Action Point 25 – LoD visualisations [REP5-195 to REP5-198]**, with justification for the visualisations prepared detailed in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]**. The Applicant has reviewed the additional LoD visualisations prepared for this Action Point and confirms that the judgements in Section 11.9 Sensitivity Testing of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** remain fair and reasonable. The Applicant also provided further information at Deadline 4 about the assessment of the LoD in **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]** and 8.5.7 Applicant's Written Summary of Oral Submissions to Issue **Specific Hearing 2 [REP4-302]**. The Applicant provided responses to ExQ2 (in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**) and Deadline 4 submission from Interested Parties (in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]**) at Deadline 5. The operation of the LoDs is controlled through the DCO:		

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		• Article 3(8) requires NGET to construct the authorised development (i.e. as the Works are described in Schedule1) in accordance with works plans, subject to the limits of deviation and the Requirements. • Works Plans - The works plans show the lines and situations, including horizontal LoD for specific works, including the pylons and overhead lines. The tables of parameters at the back of each section of Works Plans sets out the height of the infrastructure including pylon heights and the vertical upwards LoD. • Article 5 (LoD) sets out the maximum LoD for different elements of the authorised development – vertical and horizontal. • Requirement 4 – there are some Works, e.g. individual pylons, for which the LoD is restricted in **7.2 Outline Code of Construction Practice [Revision G]** commitment GG34 for mitigation purposes (secured by Requirement 4) • Requirement 6 – part (2) "The authorised development will not be in general accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects from those identified in the environmental statement." The ES has assessed the alignment shown in the Works Plans and has also undertaken a sensitivity test for the LoDs. The LoDs have		

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		therefore been assessed as reported in the ES. The approach adopted for LoDs in the Project as outlined above is consistent with other National Grid DCOs that have been approved and we believe consistent with many other DCOs.		
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 [Revision D].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, ECC confirmed agreement on this matter during call in January 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.21	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]** and is appropriate for managing construction impacts from the Project. See 3.6.14 and 3.6.15 for current position. Commitment H06 in **7.2 Outline Code of Construction Practice [REP2-014]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed.	It is noted that Commitment H06 in **7.2 Outline Code of Construction Practice [REP3-025]** has been updated to reflect wording requested by ECC. ECC can confirm this issue is now agreed	Agreed

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3.7.22	Environmental Actions and Commitments	Section 9.8 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in **7.2 Outline Code of Construction Practice [REP2-014]** has been updated to reflect wording raised by ECC and was submitted at Deadline 2. It is proposed therefore for this matter to be recorded as agreed.	In light of the changes made to the oCOCP in line with wording suggested by ECC, this can now be moved to agreed	Agreed
Other matters as required				
3.7.23	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	The Applicant shared overarching WSIs in March – June 2024 and December 2024. The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.24	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. There are still addenda to site specific WSIs forthcoming that have yet to be issued.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.7.25	Outline Archaeological	The contents of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written**	The Outline AMS-WSI is currently not agreed,	Agreed

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	Mitigation Strategy and Outline WSI.	**Scheme of Investigation [Revision C]** is considered appropriate and proportionate to the level of evaluation required. The Applicant issued the draft Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) for the post-consent stage of the project in April 2025. May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** which was submitted at Deadline 5.	This remains Under Discussion with ECC awaiting the submission of an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** which is scheduled for submission at Deadline 5. June 2026. The updated version of the AMS-OWSI has been reviewed (May 2026) and is not yet considered sufficient as a control document. Comments have been provided direct to the Applicant and these changes would be required prior to the determination of the application. EPS Archaeology confirmed on 14th July that this matter can be considered agreed.	
3.7.26	Programme for completion of archaeological fieldwork	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025. A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

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		The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.		
3.6.27	Supplementary Environmental Information	NG sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued in June 2025. Given the comments provided it is understood that ECC are in agreement with the part of the note that sets out the approach to supplementary information that will be provided for the DCO examination.	ECC is in agreement with this matter.	Agreed

3.8 Hydrology, Land Drainage and Flood Risk

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 9.2 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**.	• All Climate change allowances have now been updated in the drainage strategy to reflect previous comments. Sufficient information has been provided to demonstrate that the principles of drainage design for temporary sections of development will be appropriately designed to mitigate water quality impacts of the development. Although detailed	Agreed

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		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including storage calculations) was submitted to the examination in the form of **8.2 Drainage Strategy [Revision D]**. In paragraph 2.3.2 of **7.9 Flood Risk Assessment [APP-331]** the Applicant confirms that, the allowance applied within the surface water drainage designs, is for a 45% uplift in peak rainfall for climate change. This is in line with ECC requirements. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to the **8.2 Drainage Strategy [REP6-095]**, submitted at Deadline 6. The details regarding the management of extreme rainfall during construction are set out in Section 5.4 in **8.2 Drainage Strategy [REP6-095]**. The Applicant considers this matter can be moved to agreed.	design should reflect this as each section is developed.	

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EIA – Approach and Methods				
3.8.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.8.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B].** Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) will be shared with ECC and was submitted to the examination in the form of **8.2 Drainage Strategy [REP6-095].** With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [Revision G]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4,	With reference to **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]**, the listed data sources are accepted. With regard to surface water management, it is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. There are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding – ECC advises that reference should be made to the ECC Culvert Policy.	Not Agreed

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		together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to the **8.2 Drainage Strategy [REP6-095]**, submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5, and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	
3.8.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297].** Opinion received from the Planning Inspectorate. The Applicant shared technical notes for the following: • Works In, Over and Under Watercourses	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. It was also noted in the Statutory Consultation that ECC does not raise any principal areas of disagreement with National Grid on this topic.	Agreed

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3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B].** The key parameters and assumptions presented are considered appropriate. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188].** The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095]**, to be submitted at Deadline 6. The updated Drainage Strategy was submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been	ECC welcomes further discussion on these issues. As set out in ECC's LIR **[REP1-161]** where a number of points were made in respect of the submitted FRA **[APP-331],** the LLFA requests further clarity on the location of permanent and temporary construction works especially given the limits of deviation, but all works will require appropriate flood mitigation and surface runoff management, to ensure any excess runoff from drainage systems does not impact the surrounding area. This detail is still outstanding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5, and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	Not Agreed

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		reached, and therefore the matter is recorded as Not Agreed.		
EIA – Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. The baseline conditions and receptors presented are considered appropriate. With regard to the culvert at the proposed Tilbury North Substation please see response at ID 3.8.3. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [**Revision G**].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further	It is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		updates to the **8.2 Drainage Strategy [REP6-095]**, submitted at Deadline 6. The updated Drainage Strategy was submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	This matter is therefore moved to Not Agreed.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination in the form of **8.2 Drainage Strategy [REP6-095]**. With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [Revision G]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and	ECC acknowledges that many of its initial issues have been resolved. However, further clarity is required on the surface water runoff from construction sites, haul roads and operational assets and the SuDs techniques proposed to mitigate runoff. It is acknowledged that the Drainage strategy does provide discharge rates for features, however there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant will continue to engage with ECC on this matter. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095]**, to be submitted at Deadline 6. The updated Drainage Strategy was submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	that the situation could lead to unacceptable surface water run-off and flooding ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.8.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter at Deadline 1 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** **May 2026** The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further	ECC acknowledges that many of its initial issues have been resolved. Clarification about proposals for surface water management and storage calculations/requirements, is required. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		updates to **8.2 Drainage Strategy [REP6-095]**, to be submitted at Deadline 6. The updated Drainage Strategy was submitted at Deadline 6. However, due to the current design maturity of the Project, 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	The consideration of additional mitigation measures are presented in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].**	ECC acknowledges that many of its initial issues have been resolved. However, clarity is required on whether this point is referring to construction or operation of the scheme as different measures may be required. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095],** submitted at Deadline 6. However, due to the current design maturity of the Project, 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 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. The assessment of effects during construction presented is considered appropriate. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) was submitted to the examination in the form of **8.2 Drainage Strategy [REP6-095]**. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments	All Climate change allowances have now been updated in the drainage strategy to reflect previous comments. Sufficient information has been provided to demonstrate that the principles of drainage design for temporary sections of development will be appropriately design to mitigate water quality impacts of the development. Although detailed design should reflect this as each section is developed and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095],** submitted at Deadline 6. This matter can now be Agreed.		
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination in the form of **8.2 Drainage Strategy [REP6-095]**. With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [Revision G]**, secures that the detail of the	ECC acknowledges that many of its initial issues have been resolved. However, further clarity on the Applicants proposals for surface water management and storage calculations/requirements is required. is Although it is acknowledged that the Drainage strategy does provide discharge rates for features, there is not enough context to determine whether these rates are correct for any of these locations. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095]**, submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	provided. While the commitment W08 within **7.2 Outline Code of Construction Practice [REP3-025]** is noted, it is impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed .	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP (including Flood Warning and Evacuation Plan)	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]** and is appropriate for managing construction impacts from the Project. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits) was submitted to the examination in the form of **8.2 Drainage Strategy [REP6-095]**. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further	On going discussions that have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. The detail provided is acceptable for the construction phase but ECC would refer to comments raised in its Relevant Representation dated 27 November 2025 **[RR-1083]** ECC provided the following details in their relevant representations dated 27 November 2025: • In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5. and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		updates to **8.2 Drainage Strategy [REP6-095],** submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	
Other matters as required				
3.8.13	Flood Risk Assessment (FRA)	The draft FRA was issued to stakeholders in January and March 2025. The scope, methodology, assessment and conclusions drawn in the FRA are considered appropriate and proportionate. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]** further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) were submitted **8.2 Drainage Strategy [REP6-095].** The Applicant will engage with the LLFA to discuss and resolve the comments provided on **8.2 Drainage Strategy [REP6-095].** With regard to the culvert at the proposed Tilbury North Substation, commitment W08 within **7.2 Outline Code of Construction Practice [Revision G]**, secures that the detail of the designs to maintain existing overland flow routes, will be developed by the Main Works Contractor(s) in liaison with the LLFAs, and	Discussions have resolved many issues - further information to be provided within the FRA for submission with the DCO surrounding the proposals for surface water management and storage calculations/requirements. This detail is still outstanding as raised in our Relevant Representation dated 27 November 2025 **[RR-1083]** ECC provided the following details in their relevant representations dated 27 November 2025: • The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		further that such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. The Applicant has continued to engage with ECC LLFA. The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4, together with a new appendix of drainage plans in **8.2.1 Drainage Strategy - Appendix B [REP4-188]**. The updated plan addresses the comments received from Essex County Council LLFA on the first iteration of the Drainage Strategy. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [REP6-095]** which ECC LLFA would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G].** In response to the comments submitted by ECC at Deadline 5, the Applicant has made further updates to **8.2 Drainage Strategy [REP6-095]**, submitted at Deadline 6. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. • In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events. ECC would refer to comments raised in respect of the **Drainage Strategy [REP4-186] submitted** at deadline 5 and although the updated Drainage Strategy submitted at Deadline 6 is noted, as the detailed design are to be developed subsequently by the Main Works Contractor, it is considered there is insufficient detail available at the moment to provide the certainty required. As a result a mutually agreed position cannot be agreed. This matter is therefore moved to Not Agreed.	

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3.9 Landscape and Visual

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment. The Applicant has responded on landscape value under ID 3.9.4. The Applicant notes that this matter can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20 May 2026.	ECC agree with the overarching policy documents stated in the Landscape and Visual assessment is presented in **Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]** and Section 13.2 Chapter 13 (Landscape and Visual) of the **ES [APP-226]**.	Agreed
EIA – Approach and Methods				
3.9.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The study area was agreed through the **6.19 Scoping Report [APP-288] to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning	Generally, ECC do not have issues with the study area, however, in relation to the visual assessment ECC feel there are opportunities outside the study area, that could be taken to demonstrate 'no significant effect' that would aid understanding.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Inspectorate and through subsequent thematic workshops. The Applicant suggests that the study area (excluding viewpoints) can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20 May 2026. The Applicant has responded on viewpoints under ID 3.9.4a.		
3.9.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The request for 1:10,000 scale mapping for **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [Revision D]** 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, REP4-180 to REP4-182]** is accompanied by a location map on 1:25,000 OS mapping with the field of view also indicated on the figure. The viewpoint assessment in Annex A of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]** is accompanied by 1:25,000 OS mapping and aerial imagery. The Applicant has responded on landscape value and value of views under ID 3.9.4.	ECC Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified that the limited number of viewpoints and visualisations that are proposed over the length of the Project needed to be reviewed. Generally, ECC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased. ECC identified a number of additional areas where they believe data quality and presentation could have been improved in order to aid access and interpretation. ECC welcome the changes made on the other issues.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant suggests that the matter of data sources apart from those within the context of the viewpoints can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20 May 2026. The Applicant has responded on viewpoints under ID 3.9.4a.		
3.9.4	Assessment methodology (including LVIA methodology)	The assessment methodology is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]**. Paragraph 13.4.9 and Table A13.1.4 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]** set out the approach to consideration of landscape value. The Applicant's position regarding the approach to landscape value is set out in response ID 7.5.1 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant suggests that the matter of the assessment methodology (excluding viewpoints) can be agreed between both parties based on a meeting to discuss the Statement of Common Ground with ECC on 20 May 2026. The Applicant has responded on viewpoints under ID 3.9.4a.	ECC recognise and approved the methodology for assessing Landscape and Visual as agreed through the EIA Scoping Report and Scoping Opinion. ECC note that the Valued Landscape Assessment criteria follow the Landscape Institute guidance, 2021.	Agreed
3.9.4a	Viewpoints	The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and**	ECC raised concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 '*Outside nationally designated areas, there are local landscapes that may be*	Not Agreed

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		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 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 [Revisions 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].** This includes viewpoints beyond 1.5 km. 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 the **7.12 Visualisations [APP-350 - APP-351, REP4-182].** 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	*highly valued locally'* nor how the following in the current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: '*Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.'* This issue relates particularly in several river valleys along the route. In ECC's Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues they flagged that a Valued Landscape Assessment should form part of the Landscape and Visual Impact Assessment carried out e.g. through the final EIA. Local landscape designation no longer forms part of promoted government policy and therefore local value generally needs to be assessed in line with 'TGN 02-21: Assessing landscape value outside national designations' Valued landscape criteria have now been included in the landscape assessment; however, ECC is concerned that some of the evaluation is flawed. In addition, as the baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly affected, particularly river valleys ECC	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		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 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. The ECC position against this matter relates to the LVIA method and assessment in terms of landscape and visual value rather than viewpoints. Matters relating to method, including landscape value are considered under ID 3.9.4 and are agreed. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	also had concerns regarding whether a preliminary judgement on significance had been determined without going through the stage of identifying susceptibility and magnitude of effects. ECC are substantially satisfied that all stages of the LVIA process have been executed although not necessarily with all aspects of the approach. [RG1.1][PD1.2] ECC also remarked that the preliminary LVIA did not appear to include details of the agreed criteria on which the assessment judgements are based Whilst all criteria have now been identified and presented in the ES, ECC retain issue with the approach to landscape value and value of the view.	
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The key parameters and assumptions presented are considered appropriate.	Latest version of ES has been reviewed and ECC's position Key parameters and assumptions associated with the Landscape and Visual assessment are acceptable.	Agreed
EIA – Baseline Conditions				

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The baseline conditions and receptors presented are considered appropriate. The Applicant's position regarding the approach to visual receptors and groupings is set out in response ID 7.8.2 in Table 4.20 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.	Comments issued at Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues - ECC identified concerns with the Visual Receptors and Groupings have been identified based only partially on shared landscape characteristics and a similarity in the nature of views. ECC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, concerns were raised that clarity and detail may have been lost as a result. ECC retain these concerns, yet recognise the approach taken.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [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 [Revision B]**. Embedded mitigation is considered appropriate, proportionate and robust to address potential effects. It is not possible for embedded mitigation measures to remove the significant residual effects of a project of this nature. The Applicant acknowledges that residual landscape and visual effects remain in some locations, including within more sensitive	The inadequacy of undergrounding (embedded mitigation) and route alignment is still a major concern. ECC acknowledges the embedded and mitigation measures proposed. However, significant impacts remain, particularly in sensitive landscape areas. **Statutory Consultation May/June 2024 in relation to Landscape and Visual Issues –** ECC identified that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing is required, particularly in river valleys, to protect valued local landscapes, long-distant rights of way and rural amenity sites.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		landscapes. However, these effects have been fully assessed and are considered, on balance, to be acceptable in the context of the Project and its need case. The Applicant does not agree that further undergrounding or re-routeing is required. The current design represents an appropriate and balanced solution having regard to policy, landscape, environmental and engineering considerations. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.8	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and **7.2 Outline Code of Construction [Revision G]** The standard mitigation is considered appropriate, 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.	ECCs position on Standard mitigation measures is that they do not address or reduce significant landscape and visual impacts. The lack of detail and clarity at this stage is deemed far too vague for a project of this scale and impact.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The Applicant's approach on landscape mitigation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** 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 recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The additional mitigation measures fail to address the landscape and visual impacts. For a development of this scale and harm ECC consider that 'additional mitigation' is sort to address the negative landscape impact on the landscape character, tree and hedgerow losses and visual amenity impacts.	Not Agreed
3.9.9a	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 the **Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 4 [REP6-118]**. Without prejudice to this position, the Applicant has however provided details of	ECCs view on the applicant's approach to landscape compensation planting remains a concern. We have been consistent in stating that a development of this scale and impact (on the landscape) should include a comprehensive, detailed and deliverable compensation scheme. The lack of clarity on compensation planting, the details of this, as well as how successful the management and maintenance will be, are the main issues.	Not Agreed

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		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 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 3:1 commitment does not relate to hedgerows which will be mitigated through the BNG metric. The Applicant's response to monitoring and 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].**	Specifically, regarding the 3-1 replacement tree planting ECC would like to raise the following: Outstanding baseline information: • What definition of a tree is being used? (Size, within hedgerow, groups, etc) • How many trees being removed? (Linked to parish area) • Will the 3-1 include hedgerow removal compensation? Practical replacement issues: • What is the proposed replacement tree specification? (size, species, mix etc) • Are these trees available from UK nurseries? • How will the maintenance and establishment of the trees be managed and monitored? • Is there available space for tree planting and what land will be used? Other queries: • What tree species will be selected? (Like for like or other?) • What is the ownership, management and maintenance position for these trees? • What assurances are there that plant losses will be suitably replaced and managed to establishment?	

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			• Location- i.e. where will the trees be planted is no space is available in the immediate location of the losses? • In areas where off-site locations are not available, how will compensation be provided? (NB: as with S106 requirements, compensation needs to be provided within the location/near location associated with the project.) The general approach to compensation remains unclear. The applicant team are working to the assumption that compensation is not required. (Unless specifically instructed to provide via the Security of State.) We have been negotiating a compensation option, which may include a level on off-site landscape provision, but there are no assurances that this will be provided or delivered. We have remaining concerns that the wider NtT project proceeds without the explicit need to provide compensation. Timings and delivery mechanisms remain at an unresolved stage, without detail or clauses linked to the potential approval. As highlighted above (compensation), there remains several concerns and questions regarding off site planting. The 5year management and maintenance plan (including monitoring) is a concern. With long dry summers, watering will be essential to provide the environment for establishment.	

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			The expectation to check this planting (and replacements) also needs to be robust and adequately resourced. Our team monitor the restoration planting for all the Essex Minerals extraction sites. This programme of monitoring is very resource heavy on the Local Authority and is linked to the necessary planning tools (Planning Conditions and Planning Enforcement) to ensure the correct scheme is implemented and managed. Compensation for residual landscape and residual impacts, particularly in relation to the overhead infrastructure, is still not addressed. The 'potential compensation' lacks clarity, and creates several further questions on the deliverability, management, monitoring and timeframe. The lack of detail for the compensation makes it impossible to agree this point. We fundamentally disagree with the Applicant's position on the need for compensatory planting. This matter can be moved to Not Agreed notwithstanding our ongoing discussions. All ECC's points made are without prejudice that replacement trees are mitigation, not compensation.	
EIA – Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13**	Landscape – Potential tree and hedgerow loss along the route has not been	Not Agreed

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		Environmental Statement Chapter 13 - Landscape and Visual [Revision B]. The assessment of effects during construction presented is considered appropriate. With regard to vegetation loss, the assessment is based on an assumed worst case tree and hedgerow removal, as detailed 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 [Revision C].** **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 B].** 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 [REP1-065].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	meaningfully quantified in landscape and visual terms in the assessment. Having requested information to understand what the measured and quantifiable tree and hedgerow (baseline) losses are; ECC ultimately remain without this information.	
3.9.11	Operational (and maintenance) effects	The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]** and was	ECC recognises that there will be a significant negative landscape and visual impact at both construction and operational stages over the length of the Project.	Not Agreed

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		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 [APP-229 to APP-232]** and illustrative materials on **Figures 13.1 to 13.19 of the ES (6.13.F1 to 6.13.F19 [APP-237 to APP-255, REP4-158 to REP4-160]).** The assessment team, which includes highly experienced Chartered Members of the Landscape Institute, has thoroughly explored potential effects on landscape 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. ECC confirm recognition of significant landscape and visual effects during operation. The matter relating to landscape compensation is considered under ID 3.9.9a. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this. The lack of detail for the compensation makes it impossible to agree this point. The issues above remain substantially unaddressed. .	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.13**	The broad location and alignment of the construction routes remain a concern. Numerous instances where construction	Not Agreed

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		Environmental Statement Chapter 13 - Landscape and Visual [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]**. 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]**. Matters regarding replacement planting relate to the Outline LEMP (ID 3.9.13). The Applicant's position relating to monitoring and 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].**	routes have been routed without any detailed site analysis of the existing landscape and features raise concern. These will result in several unnecessary tree and hedgerow removal. Concerns around replacement planting and its establishment also remain a concern, with a lack of detail to provide assurance.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.13	Outline LEMP	**7.4 Outline Landscape and Ecology Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate. The Applicant's position against ID3.4.8 responds to the ECC position relating to terminology. The Applicant's position on landscape mitigation and compensation is also set out under IDs 3.2.14, 3.2.15 and 3.9.9a. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC retain major concerns particularly in relation to definition, scope and scale of term 'compensation'. Offsite compensation remains unresolved, especially the detail concerning the location, land ownership and detailed suitability of what could be achieved. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations, with geo-located planting plans and habitat creation evidence. ECC recommend that additional mitigation and compensation measures be considered in consultation with Place Services, Essex Local Nature Recovery Strategy and Essex Wildlife Trust and other wildlife organisations, including enhanced planting schemes in key locations, and landscape-scale GI interventions.	Not Agreed
3.9.14	Cumulative Effects	The cumulative effects of the Project have been assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** This includes an assessment of cumulative effects on landscape and visual receptors. The Applicant considers that the cumulative assessment is robust, proportionate and compliant with best practice.	ECC continue to have remaining concerns regarding potential cumulative adverse landscape and visual effects, both at construction and long-term operational, particularly in relation to other NSIP projects such as Bramford to Twinstead, North Falls and Five Estuaries substations.	Not Agreed

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		The cumulative assessment was updated to include Five Estuaries, North Falls, the Tarchon Interconnector Project and any other newly identified schemes in the area around Ardleigh and along the rest of the Project and is set out in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]**. The approach to the design of site-specific infrastructure including the proposed substations and CSE compounds is set out in **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP6-092]**. The Applicant's position on landscape mitigation and compensation is set out under IDs 3.2.14, 3.2.15 and 3.9.9a. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages. The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact across the entire county, especially in the vicinity of Ardleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states: "Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and	

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			sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."	

3.10 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant has prepared and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** into the Examination at Deadline 5. This document has been prepared in consultation with local authorities. Section 5 of the OESP summarises the aims and objectives of relevant national, regional and local planning policy and economic development strategy with regard to	ECC has reviewed the policy context, legislation and guidance presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265].** ECC is concerned that there is no reference to its published 'Skills and Employment Principles for Major Project and Developments' document, which outlines ECC's expectations of what a Local Employment and Skills Plan should cover. In addition, although it is acknowledged that the Applicant has submitted an outline Employment and Skills Plan, there are concerns regarding the absence of any requirement to approve the detailed plan and	Not Agreed

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		jobs, skills and economic development. This includes documents of relevance to Essex. The ESP is secured by Requirement 15 of **3.1 Draft DCO [Revision G]** which states that the authorised development may not commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted to the relevant county planning authority. Delivery of the Final ESP will be the responsibility of National Grid, with actions delivered in partnership with its GGP contractors; although it is noted in **8.13 Outline Employment and Skills Plan [REP5-215]** that co-ordination will be necessary between those responsible for the delivery of the Community Benefits Scheme and the ESP, it is emphasised that there is clear separation between these areas. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	the lack of distinct funding arrangements for the Plan which form part of the Community Benefit Fund. ECC's comments are outlined in the Council's Deadline 6 response It cannot therefore be agreed that all relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment and the Applicants response on this issue	
EIA – Approach and Methods				
3.10.2	Study area	**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 12 September 2024 to seek to agree this point in **6.20 Scoping Opinion [APP-297]**. Businesses where visual impact would be likely to be an economic consideration, that fall beyond the 3 km study area were not considered	ECC deems the revised study area and assessment criteria for the Socio-economics, Recreation and Tourism assessment to be acceptable. However, it proposed that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.	Agreed

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		likely to have significant adverse effects. These included impact on land take, disruption to direct access or visual amenity.		
3.10.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. **8.13 Outline Employment and Skills Plan [REP5-215]** was submitted at Deadline 5. The Applicant confirms that **8.13 Outline Employment and Skills Plan [REP5-215]** has sought to address matters raised across the Local Impact Reports, including: • The approach to construction employment and workforce composition • Opportunities for skills development, apprenticeships and training aligned with industry standards • Engagement with education providers and skills bodies where appropriate • Principles for local and regional supply chain engagement • Coordination with The Great Grid Partnership's established delivery processes. The Applicant has noted ECC's request for a rebranding of **8.13 Outline Employment and Skills Plan [REP5-215]** to be consistent with similar strategies on other projects, however considers that the title as it currently stands	ECC remains of the opinion that the Applicant should provide detailed labour / workforce data as set out in **ECC's Relevant Representation [RR-1083**] and **Local Impact Report [REP1-161]** to enable the development of targeted upskilling programmes and the timely coordination with local education and training providers. However, as the detailed labour / workforce data has not been provided, ECC is unable to agree to this matter so note that this matter should be moved to not agreed.	Not Agreed

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		remains appropriate and is consistent with other National Grid projects (e.g. Sealink). Baseline conditions and receptors presented in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** are considered to be appropriate and proportionate to enable a robust assessment; no further labour / workforce data is intended to be provided at this stage. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.10.4	Assessment methodology	**6.20 Scoping Opinion [APP-297]** stated, *"The Applicant should seek to agree the study area with the relevant local authorities"* and *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".* A meeting was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion. The third Technical Note was issued in March 2025 to seek agreement on the study area and methodology. The Applicant has reviewed and responded to the LIR accordingly in Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030],** and considers that the methodology and approach are robust and appropriate.	ECC deems the assessment methodology ria for the Socio-economics, Recreation and Tourism assessment to be acceptable and in particular, ECC notes that where it is identified that specific businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. The key parameters and assumptions presented are considered appropriate. Regional employment and skills analysis are set out in the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**, Paragraph 15.5.8 to 15.5.15. As stated above, the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** at Deadline 5.	ECC having reviewed the key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, has no issues to raise	Agreed
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The demographic, environmental and socio-economic characteristics of Essex have been described in Section 10.5 'Baseline Conditions' in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** and in **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [Revision C]**. How vulnerable populations would be differentially affected has been summarised in Table 10.5 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** and in the	ECC acknowledges the information set out Section 10.5 'Baseline Conditions' in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** and in **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [APP-193].** In particular, it highlights the conclusion of the ES (APP-265) at 15.5.22, "Although there is a readily available labour force, there is also potential skills gap in the area'". ECC therefore remains of the opinion that the Applicant should provide detailed labour /	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		overview of impact pathways described for each health determinant. Baseline conditions and receptors presented in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** are considered to be appropriate and proportionate to enable a robust assessment; no further labour / workforce data is intended to be provided at this stage. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	workforce data as set out in Paragraphs 4.8.12 – 4.8.14 of ECC's Local Impact Report [REP1-161] to enable effective planning, coordination with local education and training providers and the development of targeted upskilling programmes. ECC would propose that where it is identified that particular businesses will be impacted outside of the scope of this (potentially some wedding venues, hotels etc) that these should be considered on a case-by-case basis.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Discussions with ARU Writtle are ongoing. The Applicant's latest formal position is set out in **8.4.11.1 Applicant's Response to ARU Writtle [REP4-348]** and **ExQ2 CA 2.1 and HW 2.2 [REP5-193].**	ECC recognises that the potential effects on community facilities, businesses, tourism, and recreational assets, have largely been considered as part of the project design and that with the exception of the impact on ARU Writtle. ECC understand the position regarding the impact on ARU Writtle remains unresolved with discussions ongoing to agree mitigation between the parties. The concern is highlighted at paragraphs 4.8.18-4.8.19 of ECC LIR [REP1-161] Notwithstanding, ECC believe there is potential for significant (although) short term impact to businesses along the planned route, including in particular wedding venues, education facilities and equestrian centres as well as from general increase in traffic	Not Agreed

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			movements at key points of the network as outlined in ECC's **LIR [REP1-161]** to ensure there is appropriate mitigation for these businesses.	
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]** and **7.3 Outline Construction Traffic Management Plan [Revision F].** The standard mitigation is considered appropriate and proportionate to address potential effects. Additional commitments GG36 and GG37 have been added to **7.2 Outline Code of Construction Practice [Revision G]** relating to the preparation of a detailed Communications Strategy and a comprehensive complaints procedure respectively. These form part of the Applicant's approach to reducing the risk of disruption to local communities and businesses. Further detail relating to the complaints procedure was submitted at Deadline 6 as part of an updated **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP6-078].** This has taken into account ECC's previous comments relating to robustness, and includes typical response times,	ECC acknowledges the measures proposed in GG10 and SO3 of the **Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** (Chapter 15) together with the additional commitments GG36 &GG37 set out in the outline Code of Construction Practice [REP5-139] In particular, these will ensure access required for business's will be maintained where practicable, a detailed Communications Strategy to be prepared in consultation with the local authority to keep local communities and business's informed and a robust and accessible complaints procedure for dealing with issues that arise from within the local communities: the aim being to minimise the effects on community facilities, businesses, tourism, and recreational assets. At present, ECC has concerns regarding the robustness of the complaints processes as set out within ECC response to ExQ2 (REP5-242) therefore this matter is not agreed.	Not Agreed

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		escalation processes and information relating to reporting and monitoring. Matters relating to skills, training and the supply chain are covered in Matter 3.10.13.		
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [REP6-078]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** at Deadline 5. Matters relating to skills, training and the supply chain are covered separately in Matter 3.10.13.	The additional mitigation identified in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** is acknowledged in terms of its nature and scale, to address potential effects. However, ECC maintains that the scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. ECC considers it is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. There is therefore a need for a Skills and Employment Plan consistent with ECC NSIP policy which is covered in Section 3.10.8 and	Not Agreed

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			in the specific Employment and Skills section at 3.10.1 ECC acknowledges the Applicants commitment to the submission of an Employment and Skills Plan and the discussions that have taken place to date on this. ECC supports the inclusion of a requirement within the draft Development Consent Order to secure the Employment and Skills Plan but considers the Employment and Skills Plan should be subject to approval by the relevant local authorities prior to implementation rather than just submitted to the relevant authority as currently proposed in the wording of Requirement 15. There are also outstanding questions regarding the funding of employment and skills measures which remains unanswered by the applicant.	
EIA – Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C].** The assessment of effects during construction presented is considered appropriate. The Applicant has submitted **8.13 Outline Employment and Skills Plan [REP5-215]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this	ECC is concerned that the Norwich to Tilbury project during could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is	Not agreed

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		document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft DCO [Revision G]**. **6.15 ES Chapter 15 Socio-Economics, Recreation and Tourism [Revision C]** does not identify any relevant significant adverse effects of the Project arising from its construction, operation or decommissioning on socio-economic, recreation and tourism receptors. As such, **8.13 Outline Employment and Skills Plan [REP5-215]** is not required as mitigation, but is intended to maximise socio-economic benefits arising from the Project. On this basis, the use of a DCO requirement is considered appropriate and proportionate, and a separate legal agreement is not considered necessary. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of **8.8.2 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.	essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with appropriate funding through a Section 106 agreement which would respond to concerns raised **ECC LIR [REP1-161]** regarding the absence of a consolidated document at application stage while also providing greater transparency on the approach to these matters. ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. This should include: • Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes • Commitments to local job creation and use of local contractors where feasible	

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

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			proposed which is not for LPA approval and is being linked to the Community Benefit Fund	
3.10.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	ECC recognises the residual effects outlined in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** linked to the operation and maintenance of the development once completed. Based on the assessment and measures set out in paragraphs 1.7.32 – 15.7.40 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265],** it is considered this matter can be agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** and is appropriate for managing construction impacts from the Project.	From the perspective of socioeconomics, recreation and tourism, with the exception of the matters raised regarding the complaints processes, the OCoCP is considered generally acceptable. However, in light of this, this matter is not agreed.	Not Agreed
Other matters as required				
3.10.13	Skills and Training	The Applicant submitted **8.13 Outline Employment and Skills Plan [REP5-215]** at Deadline 5. This provides a clear and structured framework to support local workforce development, skills enhancement and engagement with Essex-based businesses, and	As submitted, the application contained no reference to an employment and skills strategy. As a result, there is no clarity on what the Applicant is doing for training and skills. In addition, there is a lack of reference to data on employment and skills, leading to a	Under Discussion

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		will be refined as part of the Project's delivery. The OESP is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The OESP was developed in collaboration with host authorities including ECC; the Applicant is committed to ongoing engagement with stakeholders during the preparation and delivery of the Final Employment and Skills Plan. Regional employment and skills analysis are set out in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** Paragraph 15.5.8 to 15.5.15. Employment and skills profile data for the local population are further set out in Section 3 of **8.13 Outline Employment and Skills Plan [REP5-215].** Separate to skills, the Applicant is committed to working with industry partners, local communities, and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. Later in 2026, the Applicant will begin consulting on how the community benefit funding should be used. The Applicant does not agree that a dedicated Employment and Skills Fund is necessary. The Outline Employment and Skills Plan appropriately reflects the level of commitment	request that a regional skills analysis is undertaken. ECC therefore now welcomes the Applicant's commitment to engage with the Council on a Skills, Employment and Supply Chain Strategy which responds to concerns raised **ECC LIR [REP1-161]** regarding the absence of a consolidated document at application stage and provides greater transparency on the approach to these matters. ECC believes however that this should a document which is subject to the approval of the Council through the DCO. ECC considers that any Strategy should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes: • Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes • Commitments to local job creation and use of local contractors where feasible • Evidence-based interventions informed by community engagement and local labour market data	

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		required at this stage and provides sufficient flexibility to respond to construction-stage opportunities. Community benefits and skills initiatives will be delivered through established regulatory and funding mechanisms, in line with national guidance, and are not matters to be secured through the DCO. The Final Employment and Skills Plan will be secured through Schedule 3 of the DCO as set out in **3.1 Draft DCO [Revision G]**. The approach to skills and employment is separate from the community benefits approach (which will be delivered outside of the development consent process). The Final ESP will be prepared following engagement with key stakeholders and will include additional detail to inform workforce planning which will be used to profile the anticipated skills demand. The Final ESP will be submitted to the three county councils and Thurrock (as the lead authorities for employment and skills) for their information prior to the commencement of construction.	• A sustainability and legacy framework to ensure initiatives continue from construction through to operation To support this, ECC strongly recommends the establishment of a dedicated Employment and Skills Fund. This fund should be proportionate to the scale and impact of the development and used to • Invest in local further education facilities and provision • Support employment and skills programmes • Enhance careers education and school engagement • Fund ECC officer resource for consultation and monitoring of the employment and skills strategy. In addition, ECC seeks clarification and raises concern regarding the Applicant's position that the Employment and Skills Plan should be secured as a final standalone document not requiring subsequent approval by the relevant local authorities. Given the scale, duration and local impact of the Project, and the expectations set out in NPS EN 1 (2024), paragraph 5.13.12, it would be appropriate for such a plan to be subject to formal approval to ensure that commitments are robust, appropriately tailored to local priorities, and capable of effective monitoring and delivery.	

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			ECC would also take the opportunity to suggest that skills should be considered separately from community benefits.	
3.10.14	Cumulative Effects	Inter-project cumulative effects are set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.	ECC is concerned that the Norwich to Tilbury project could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes having an effective communication strategy and ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This should be set out in an Employment, Education, Skills and Supply Chain strategy for the project and secured with appropriate funding through a Section 106 agreement. Distinct from any community benefit funding.	Not Agreed

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		These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement. In this regard, it is noted that community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through the DCO, consistent with the principles set out in the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).	ECC considers that 480 jobs is significant whatever the size of the project and that both in the short term and long term, opportunities for local employment and training as well as opportunities for local business to access the supply chain should be captured through the project especially as it remains ECC's opinion that the Project will have an impact during the construction phase on local business due to impact on key routes and junctions **ECC LIR [REP1-161]**. It is therefore requested that skills should be considered separately from community benefits. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. ECC welcomes the Applicant's engagement with the Council on an Employment and Skills	

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			Plan which responds to concerns raised in **ECC LIR [REP1-161]** but draws attention to the commentary raised in respect of this document.	

3.11 Traffic and Transport

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.11.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and Section 16.2 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed	Agreed
EIA – Approach and Methods				
3.11.2	Study Area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed	Agreed
3.11.3	Data sources	Traffic data and modelling files have been provided to ECC for review.		Agreed

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		Updated modelling has been undertaken at junctions where ECC raised concerns that baseline scenario models presented in **7.11 Transport Assessment [APP-333]** did not appear to accurately reflect baseline operation as expected, or where future baseline highway layouts are going to be changed as a result of improvements provided by other developments. A Technical Note was issued to ECC in April 2026 which provides further clarity on the data sources used. ECC confirmed via email in July 2026 that they had no further comments on this matter. Based on the above, this matter is Agreed.		
3.11.4	Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Previous concerns around using 2019 DfT data rather than more recent data have been dealt where 2023 DfT data is presented.	Agreed
3.11.5	Key parameters and assumptions	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 **of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The key parameters and assumptions presented are considered appropriate. Within **6.16 Environmental Statement Chapter 16 Traffic and Transport [APP-271]** the assessment looked at the increase to future baseline traffic as a result of the Project in combination with committed developments along the PARs. With the exception of the items below,		Agreed

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		ECC have raised no further concerns and this item is now agreed. Please refer to item 3.11.67 for discussion relating to the design of crossover points and access points.		
3.11.6	Key parameters and assumptions – HGV arrivals/departures	**Highway junctions/links** - The Applicant has and will continue to engage with Essex County Council on the junction modelling and proposed mitigation. With the exception of the mitigation at specific junctions outlined below as separate matters, ECC have raised no further concerns. This item is now agreed.	Some parameters have not been accepted as follows: • HGV arrivals/departures during the peak hours on some routes where there is sensitivity (specific highway junctions/links (to be agreed) • Agreed with the exception of junction mitigation discussed elsewhere in this document.	Agreed
3.11.7	Key parameters and assumptions – collision clusters	Collision clusters have been assessed using the criteria presented within the **6.19 Scoping Report [APP-296]** and presented at Thematic Group and Regional meetings. The Applicant considers the approach taken to be robust and appropriate for the purposes of the assessment. Please refer to item 3.11.36 for the safety scheme matter.	Collision clusters have been determined by ECC and a list of road safety schemes included in the LIR have been discussed with the Applicant. ECC to provide more background to the schemes including costs for the Applicant to consider.	Agreed
3.11.8	Key parameters and assumptions – assessment of footways	The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA	Table 16.5 sets out assessment criteria based on thresholds that are defined in the IEMA Guidelines. However, the guidance is clear that these should be viewed as a starting point and used cautiously in any assessment, and that full regard should be given to specific local conditions with a level of judgement required to determine effects.	Agreed

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		Guidelines Environmental Assessment of Traffic and Movement (2023). This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. **Section 5.2 of 7.3 Outline Construction Traffic Management Plan [Revision E]** sets out the proposed approach to pre- and post-construction surveys. Pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP.	In response to the Applicants comments on ECC's LIR submitted at Deadline 3 (p21 relating to reference 4.5.85) (**REP3-077**), ECC set out how there are sections of the PARs that have narrow existing effective footway widths due to dirt/debris overspill that have not been referenced in Tables A16.4.5 and A16.4.6. ECC suggested that the specific PARs that require mitigation in the form of "siding out" to removed the debris/dirt/mud overspill are agreed and for this to be included in the CTMP as an update. However, ECC have also discussed whether the extent of works could be agreed through the Road Safety Review mechanism whereby the PARs are driven to pick up any issues to be rectified prior to works commencing.	

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3.11.9	Key parameters and assumptions – monitoring, management and mitigation	The Applicant has developed the **7.3 Outline Construction Traffic Management Plan [Revision E]** to monitor, mitigate and manage the impacts around construction traffic. National Grid is committed to monitoring and managing the Project's impact on the road network; Section 6 of the Outline CTMP sets out the robust procedures that are anticipated to be undertaken to monitor and manage compliance with the Outline CTMP during construction. This includes detail of the Non-Compliance Procedure in Section 6.3. Instances of non-compliance will be investigated to identify corrective actions where necessary. Section 6 also sets out that the Main Works Contractor(s) will be expected to use a monitoring and reporting system to monitor the number of construction vehicles using the PARs between the sites and the SRN/MRN. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. ECC refers to the following points on the CTMP that are relevant: • Commitment to monitoring and managing worker arrival/departure times (to ensure they are not during network peak times) • Corrective actions if there is non-compliance • Commitment to mini-bus • Commitment to detailing parking demand and supply with the access design to compounds along with cycle parking ECC highlights that the junction mitigation has not yet been agreed. ECC welcome further discussion on these points	Under Discussion
EIA – Baseline Conditions				
3.11.10	Baseline conditions	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. A review of the list of committed	A Technical Note was received on 23rd April 2026 relating to traffic modelling which we understand includes a review of committed development at relevant junctions. ECC to review and provide comment to the Applicant	Agreed

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		developments to be considered provided by Essex County Council on 27th August 2025 (post DCO submission) has been undertaken. The Applicant has also been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs that should be considered. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination at Deadline 4. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. With the exception of Collision Clusters (ID **3.11.7**) and HGV impacts on specific schools listed by ECC (ID **3.11.21**) ECC have raised no further concerns. This matter is agreed.	ECC have reviewed the Technical Note and agreed that the committed development has been taken into account at relevant junctions. Therefore, the status of this discussion is agreed on the basis that collision data and impacts on school receptors are dealt with elsewhere in this document.	
3.11.11	Assessment of traffic impact on	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the	The impacts on narrow footways and collision clusters are dealt with elsewhere.	Under Discussion

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	PARS - highways and identification of mitigation	likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. A review of the latest three year personal injury data post COVID has been undertaken to identify any new collision clusters and presented in the **7.11.1 Transport Assessment [REP5-165]**. The Applicant is committed to continue discussions with ECC on this matter which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	In relation to impacts due to drive delay note the following: In ECC's LIR, we noted that the following junctions should include restricting development traffic during the AM peak – particularly in the short term worst case construction peak: • Junction 58 A131 Great Notley Bypass/Main Road Roundabout • Junction 63 A414 Three Mile Hill/A1114 London Road Roundabout In ECC's LIR, we noted that the following links were defined as having a significant impact on driver delay and required further discussion on mitigation: • PAR 37 A1124 Halsted Road • PAR 49 A414 Three Mile Hill-A1114 London Road • PAR 51 A1060 Rainsford Road-A1060 Roxwell Road • PAR 59 A129 Sun Street-A129 London Road-A129 Rayleigh Road The following junctions have monitoring and manage proposed – should issues be identified there needs to be an understanding of what will be implemented: • Site 48 A120 Braintree Bypass/A131 Great Notley Bypass • Site 73 A127 Southend Arterial Road/A176 Noak Hill Road	

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			• Site 69 A1060 Roxwell Road/Lordship Road • Site 71 A414 Greenbury Way/Highwood Road • Site 74 A176 Noak Hill Road/Wash Road • Site 82 A129 London Road/Mountnessing Road	
3.11.12	Assessment of traffic impact on PARS - WCH and identification of mitigation	**6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** undertook a review of all Primary Access Routes (PARs) to assess pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. This included locations where PRoWs connected to the PAR. Where required, additional mitigation has been proposed within the **7.3 Outline Construction Traffic Management Plan [REP4-174]** Tables 5.6, 5.7 and 5.8. This includes: • Providing construction vehicle drivers with an information pack which will provide details on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway. • Ensuring adjacent vegetation is maintained to keep verges clear. • Placing warning signs. **Section 5.2 of 7.3 Outline Construction Traffic Management Plan [Revision E]** sets out the proposed approach to pre- and post-construction surveys. Pre- and post-construction condition surveys of the existing highway	With regard to environmental impacts on the PARS, ECC awaits the outcome of the Applicants review but welcomes the opportunity to continue the discussion on necessary extent of mitigation ECC agree with the mitigation identified for WCH.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		network are proposed to be undertaken on AIL and HGV routes. Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP. The Applicant considers the approach taken and mitigation proposed to be robust, appropriate and proportionate. This matter is agreed.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.11.13	Embedded mitigation	The methodology for assessing Traffic and Transport was outlined through the **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate which stated that PARs should be assessed within **the 6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-275].**	This point on methodology referred to here can be agreed	Agreed

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		The comment referring to diversion routes and road closures is covered in ID **3.11.72** below.		
3.11.14	Embedded mitigation – monitoring and management of workforce	The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. Section 5.2.1 of the **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** has been updated to state that construction workers associated with OHL and Cables and Substations is to achieve an occupancy rate of 2 per vehicle (as per assumptions). The updated **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** details that the vehicle occupancy factors will form part of the baseline survey targets, with the survey shared with the Local Highway Authority.	Further discussion on monitoring commitments and requirements in CTMP. The transport assessments assume that construction workers will travel to/from the site outside of the highway network peak hours. ECC's concerns about this are far reaching and include whether this will be adhered to during the autumn/winter seasons with the prevailing weather and reduced daylight hours, and how this would be monitored and managed. Further detail is needed in the CTMP to show how the construction work would operate (shift patterns etc) within these defined hours and more surety on how this would be enforced. The Applicant has confirmed there are no shifts. Workers will be on site between 0700-1900hrs and non compliance includes "construction traffic (including workers) operating outside the agreed hours." However, on this latter point there is no mention of non-compliance of workers arriving/departing during the peak hours. We would want to see this non-compliance listed. The CWTP (at 8.2.5) includes a commitment to collecting actual shift start and finish times to capture potential differences in seasonality. However, this collection of data should also be used to determine whether staff are arriving/departing in the network	Under Discussion

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		This will capture the surveyed mode share from when a site is occupied. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	peak hours. The consideration of peak hour arrival/departures should be included in the list to be assessed at Section 8.2.6.	
3.11.15	Embedded mitigation – arrangements for emergency maintenance	The Applicant notes this request and will enter into discussions with Essex County Council on the subject of emergency callouts that could reasonably be attributed to the Project. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion	Details on the approach to extraordinary maintenance have been provided in the Local Impact Report. ECC await confirmation from the Applicant as to whether this is accepted. ECC welcomes further discussions on the subject of emergency callouts.	Under Discussion
3.11.16	Embedded mitigation – reducing mileage of road freight	**7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]** provides detail of the assessment undertaken by the Applicant, to reduce the amount of distance travelled on road by freight vehicles. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of these being used to source materials where possible. The Applicant has committed to engage with the Developer's Forum and is happy to discuss with other developers the opportunities to reduce long distance road freight deliveries. The front-loaded scenario was included within the assessment detailed in **7.11 Transport Assessment [APP-333].** This was completed to understand if any additional mitigation, above	ECC welcomes the commitment to engage with the Developers Forum but is seeking a commitment in a relevant document to reduce the amount of distance travelled on road by freight vehicles and a multi modal strategy. It is important that this commitment is readily accessible to the Contractor to consider in more detail to determine what is feasible for Norwich to Tilbury. ECCs points on the CTMP have been raised at 3.11.5 and 3.11.7	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		the 'just-in-time' scenario was required on road links from the Ports to the Primary Access Routes (PARs). The shorter timeframe in the front-loaded scenario resulted in higher impacts on the PARs but experienced over shorter periods of time. The Applicant and Main Works Contractor(s) will continue discussions with the Local Highway Authority when additional information on sourcing is available. The monitoring and management principles detailed in **7.3 Outline Construction Traffic Management Plan [REP4-174]** are applicable to either scenario, with the Main Works Contractor(s) monitoring the number of HGVs accepted into site. The Applicant will adhere to the National Policy Statement EN-1 (2024), paragraph 5.14.13 requirements and will continue to engage with Essex County Council during the development of material sourcing. The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision E]** to include a commitment that "the appointed Main Works Contractor(s), will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items." Additionally, the Contractor will review and discuss ways of reducing freight by road with the Local Highway Authority. This will include (but not restricted to): • consolidation centres:		

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		• wider considerations of the Multi Modal Strategy using rail and port facilities to replace long distance road freight; and • review of 'just in time' scenario (Scenario 2) set out in Appendix G of **7.11 Transport Assessment [APP-333]**		
3.11.17	Embedded mitigation – Monitoring vehicle numbers	The Applicant has stated within the **7.3 Outline Construction Traffic Management Plan [REP4-174]** 'Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary' (paragraph 5.4.17). The **7.3 Outline Construction Traffic Management Plan [REP4-174]** additionally states 'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the [Primary Access Routes] between the sites and the [Strategic Road Network/Major Road Network]' (paragraph 6.2.6). Paragraph 5.4.19 of **7.3 Outline Construction Traffic Management Plan [Revision E]** details that the construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within the Transport Assessment and Environmental Statement. The Applicant and its Main Works Contractor(s) will develop a monitoring framework which will include potential mitigations, as part of the final CTMP. The monitoring of the construction vehicles will form part of the reporting to the Local Highway	The Applicant has included a commitment to monitor construction traffic. However, ECC believe there needs to be confirmation in the **Outline CTMP [REP 3-028]** to: • review the monitored levels of traffic against the specific number of vehicles assessed in the ES; and • to include a list of interventions that would be considered by the Contractor if the review shows the monitoring levels are above the assessed levels. Refer to 3.11.5 for points raised on the CTMP that are relevant. As already identified by ECC it is important that there is a commitment to monitor and review the number of vehicles in the ES and to include interventions where there is an increase. This is on the basis that we have agreed the traffic generation subject to the assumptions underpinning it. We therefore need to have some comfort that there is some accountability if the numbers were to be increased above what has been assessed through the DCO.	Under Discussion

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		Authority. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [REP4-174].** The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.18	Standard mitigation	Numerous communication channels are set out in the **7.3 Outline Construction Traffic Management Plan [REP4-174]**: • Community Liaison Officers will be appointed to engage with key stakeholders, local businesses and the community. • Community Liaison Officers to regularly inform the local community, including notification of heavy traffic periods and be aware of planned community events that may interface with construction operations. • Contact phone number (helpline) provided to the public to raise concerns and complaints. These will be listed in a register by the MWC, alongside a record of responses and actions taken to address each item. • Communication sent to the public through letters and emails, detailing the extent of the works and any related traffic management measures (which may impact the community).	Wider commitment to engaging with the public. ECC welcomes the measures identified but considers further measures are required to be set out in the CTMP: • VMS boards at key locations • Providing information on AILs in terms of what they are, how they may impact road users and how to be aware of the routes and timings to avoid the area. The CWTP is not yet agreed and forms part of the standard mitigation proposed. The Outline CTMP is not yet agreed and forms part of the standard mitigation proposed. Note points identified in the ECC Response to Inspector's Questions, Q1 **[REP3-078]**: • to include information on how people's journeys will be impacted without people needing to consult multiple sources of information – the Applicant has agreed to	Under Discussion

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		• Details on proposed traffic management is anticipated to be made available on the Project website. • Specific requirements for works in highways will outline the communications expectations for road works associated with the Project. In addition, Section 2 of **7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public Information [REP4-168]** details the complaints procedure that stakeholders can follow to report any complaints associated with the construction of the Project. Paragraph 5.3.13 of **7.3 Outline Construction Traffic Management Plan [Revision E]** details "Variable Messaging Sign (VMS) boards will be implemented at locations agreed with the Local Highway Authority and National Highways to communicate upcoming AIL movements and/or other disruptions to PARs." Paragraph 5.3.15 **7.3 Outline Construction Traffic Management Plan [Revision E]** details that information will be made available to the wider community on what AILS are, why they are needed and how they impact the local/strategic road network, along with links to find further information. This information will be provided through standard channels, to remove duplication of information. The Applicant is committed to continue discussions with ECC, which will likely conclude	review how full AIL routes across county boundaries and road networks can be displayed in one location for ease of reference for road users.	

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		after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.19	Additional mitigation – PRoW interactions with PARs	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely traffic and transport impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. This included a review of PARs with sections of narrow footways and collision clusters. Section 5.9 of **7.3 Outline Construction Traffic Management Plan [REP4-174]** details the proposed mitigation measures on PARs across the project. With specific regard to temporary alterations to PRoW connections to the highway network resulting from PRoW diversions, National Grid has engaged with Essex County Council and through this engagement the following eight locations have been highlighted for further consideration and will be subject to Road Safety Audits at the relevant stages of the design and construction process: • Langham 16 (Eastern End) • Langham 16 (Western End) • Great Tey 36	Including mitigation for all PRoW that link onto or cross the PARs Mitigation for narrow footways on PARs Mitigation for road safety issues on PARs Crossing facilities/pinch points It is proposed that the extent of mitigation for the narrow footways, and PRoW that link onto or cross the PARs are included in the Road Safety Review which involves driving the PARs prior to construction starting. In this way the routes are considered based on the latest information. It was discussed that the pinch point identified by ECC on Spa Road is being considered further by the Applicant – ECC await further detail. The form and scope of the road safety review is to be discussed in more detail.	Agreed

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		• Great Tey 38 • Great Tey 50 • Great Waltham 74 • Stock 37 • West Hordon 69. The Applicant is engaging with ECC in relation to Spa Road in a separate matter (ID 3.11.27). The **7.3 Outline Construction Traffic Management Plan (Revision E) [REP5-149]** was updated to include the following paragraph. Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. It is anticipated that the rural routes will be the focus of the drive through survey. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP.		

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3.11.20	Additional mitigation – peak hour restrictions	**7.11 Transport Assessment [APP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management Plan [REP4-174]** provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for workers arriving and departing from site, including the assessment assumptions. The Applicant is committed to continue discussions with ECC, which will likely conclude	A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC have reviewed and have no comments, and junction mitigation discussions are to progress. It is understood that construction worker shift start and end times will be monitored. However, there is no commitment to assess whether they are arriving/departing during the peak hours.	Under Discussion

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		after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.21	Additional mitigation - schools	Schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and Transport [APP-271].** Where schools are directly located adjacent to a construction route, e.g. Margaretting Church of England Primary School, construction vehicles will avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management Plan [REP4-174]**. This included a review of all proposed schools identified during the review of committed developments. This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. A review of other existing schools where Essex County Council has raised concerns has been carried out. From the review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as	ECC note the Applicant has provided justification for limiting the restrictions on PARs in their document 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 (p54) **[REP3-070]**. This is based on a review of infrastructure. However, ECC have stated that observations to understand patterns of movement and behaviour should be undertaken to fully understand the risks as set out in ECC's Response in document **REP3-077**. In its **LIR [REP1-161]** ECC have raised concerns around activity concentrated on the PARs in the vicinity of the schools. ECC suggested on site observations are undertaken by the Applicant to understand how the school children and parents moved in the area around the school as this is key to understanding the impacts of the potential interactions with the HGVs. In summary, it can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to the school drop off/pick up times. Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or	Under Discussion

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		detailed below: 1) Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic 2) Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic 3) Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic 4) Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing. The Applicant considers that the review it has undertaken of the schools listed above is robust and appropriate. However, noting that ECC has remaining concerns, the Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as 'Under Discussion'.	constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR) The Applicant has included restriction on construction traffic to avoid the pick up and drop off times of the school in Margaretting only. In response to ExQ1 **[REP3-078]** ECC set out the following wording to be updated in the CTMP which deals with the above: • Paragraph 2.3.5 to be updated and moved to below 2.3.7 (under Heavy Goods Vehicle Timings) – updated wording shown in italics: • The Contractor(s) commits to restricting HGV movements during school drop off/pick up times on PARs where there is school related activity for the following locations: • Quilters Infant & Junior School, Billericay, A129 and A176 • Billericay School (secondary), A129 and A176 • Cressing Primary School, B1018, Tye Green	

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			• Maltings Academy (secondary) and Powers Hall Academy (primary), Spinks Lane/Spa Road, Wickham • Margaretting Church of England Primary School, B1002, Margaretting ECC require observations and review to beby the Contractor of the routes identified above to whether	
EIA – Assessment Conclusions				
3.11.22	Construction effects – Spa Road	The Applicant undertook vehicle tracking of Spa Road during the initial assessment of the suitability of Spa Road for the use by construction traffic; both two-way HGVs and the Large Mobile Crane, which is an Abnormal Indivisible Load (AIL)The proposed removal of street furniture on Spa Road at Constraint E7, as shown on Sheets 5 and 6, Section E of **7.3 7.3 Outline Construction Traffic Management Plan, Appendix C – Indicative Highway Mitigation Plans**, is intended to facilitate the movement of AIL vehicles to site. It is not anticipated that street furniture removal is required at constraint E7 for two-way HGV traffic; with the absence of the splitter island itself in this location from OS imagery, this is based on engineering judgement; vehicle type, geometry of the road, and available Streetview imagery for similar vehicle types travelling along the road, as well as the road being on an existing bus route. Furthermore, the Applicant is not aware of any width restrictions along this	Effects at existing traffic calming features on Spa Road, Witham in relation to accommodating HGV movements. Concerns around potential damage to kerbs due to increase in HGVs on this route causing safety issues for non-car users for example. The Applicant is to review following recent discussion around how this particular location can be monitored with a mechanism in place to deal with repairs and/or permanent engineering solution.	Under Discussion

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		road that would impact on construction traffic HGV movements. Based on these factors, the Applicant considers it reasonable judgement that HGVs are accommodated but has flagged the location as a constraint to facilitate AIL access, should it be required. The Applicant notes that mitigation plans included within **7.3 Outline Construction Traffic Management Plan [Rev E]** are indicative only. They have been prepared to demonstrate the type and extent of potential mitigation that may be required. These matters will be determined by the Main Works Contractor(s) during the development of detailed design. Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** an assessment of road safety was undertaken in relation to the increase in future baseline traffic as a result of construction vehicle movements. This assessment was undertaken with the understanding that two-way movement of HGV's and AILs could be accommodated along Spa Road. Where not feasible, appropriate traffic management measures would be provided as presented on **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section E [APP-317].** No significant effects on road safety were therefore identified at this location. The Applicant is committed to continue discussions with ECC, which will likely conclude		

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		after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.23	Construction effects – PAR 50	For PAR 50 A1016 Waterhouse Lane/A1016 Rainsford Lane the mitigation Table A16.4.5 refers to should have stated that within the CTMP the Driver information pack will identify locations where there may be a higher number of cyclists and pedestrians on or crossing the carriageway. Along PAR 50 there would only be a 2% increase in traffic as a result of the Project. The assessment for severance on this PAR therefore found there to be no significant effects for WCH.	Agreed	Agreed
3.11.24	Construction effects – bus passenger delay	The assessment of bus passenger delay presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been undertaken using all identified bus services including school buses. **7.3 Outline Construction Traffic Management Plan [Revision E]** sets out mitigation measures to minimise potential impacts on public bus services. The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption is minimised. Section 5.8 of **7.3 Outline Construction Traffic Management Plan [Revision E]** was updated at Deadline 5 to confirm that advanced notification of planned diversions and closures will be issued to relevant stakeholders, including bus operators, where these may affect operations, to enable	Agreed subject to wording being updated to "engagement" rather than "notification"	Agreed

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		engagement on these at the earliest opportunity. Therefore, this matter is Agreed. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operations. **7.11 Transport Assessment [APP-333]** details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority. The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan.		
3.11.25	Construction effects – Fear and intimidation and Amenity	The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment of Traffic and Movement (2023)[1]. This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant	ECC believes that site conditions have not adequately been considered, in particular, the effective footway width (e.g. PAR 39, PAR 41 and PAR 51). A qualitative review of fear and intimidation along Primary Access Routes (PARs) is requested alongside the IEMA thresholds is therefore requested. ECC suggest that the Applicant reviews all the PARs to ensure all locations have been appropriately assessed. This Road Safety Assessment would pick up all the locations that require siding out or cutting back of	Agreed

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

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		considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. For example, for PAR 37 A1124 Halstead Road mitigation has been proposed within the **7.3 Outline Construction Traffic Management Plan [REP4-174]** to address the impact on Amenity and Fear and Intimidation. This included a driver information pack which will identify locations where pedestrians may be walking either on a verge or carriageway, ensuring adjacent vegetation is maintained to keep verge clear and allow the full width of footway to be utilised, and placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway. For PAR 41 there are verges of various widths located alongside the carriageway through rural sections and with limited trip attractors apart from Public Rights of Way (PRoWs); where pedestrians are likely to cross the carriageway to reach the opposite PRoW, it is unlikely that pedestrians would walk along the PAR itself which has a speed limit of 50 mph. Within the urban areas footways are provided with small sections of low level vegetation encroachment from adjacent verge. The residual construction significance of effects would therefore be slight adverse, temporary, and not significant. For PAR 42 and 43 there are a few localised short sections of footway that are narrowed by existing low level vegetation / encroachment from an adjacent verge that could be utilised. The increase in construction traffic	vegetation. If this is agreed with the Applicant then this should be included in the CTMP as a commitment.	

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		on these PARs is notably low (17 HGVs an hour – 9 in each direction). The residual construction significance of effects is therefore considered to be slight adverse, temporary, and not significant. The **7.3 Outline Construction Traffic Management Plan (Revision E) [REP5-149]** was updated to include the following paragraph: Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. It is anticipated that the rural routes will be the focus of the drive through survey. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.11.26	Outline CoCP	**7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction related mitigation measures specified in **6.16 Environmental Statement Chapter 16 - Traffic**	Discussion related to 3.10.7 - 3.10.10	Agreed

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		and Transport [APP-271] and is appropriate for managing construction impacts from the Project. Meeting held on 9th October to agree on the structure for the **7.2 Outline Code of Construction Practice [REP4-164].** With the exception of the matters associated with Key Assumptions and Parameters above, ECC have raised no further concerns. This matter is agreed.		
3.11.27	Construction effects	The **7.11 Transport Assessment [APP-333]** provides the assessment of the junctions along PARs 50 and 51 at Chelmsford and PAR 59 at Billericay. On those junctions that are forecast to operate at or over capacity on the future baseline scenarios during the worst-case peak period, there may continue to be some level of impact outside of that period. However, typically there is only a marginal impact upon capacity due to the addition of the Project construction traffic flows over the existing and/or future baseline scenarios. The Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower. The results of the modelling of Site 40 shows that the junction currently operates already over capacity during the PM peak hour and there is no predicted change in junction performance or state as a result of the Project construction flows with a change of the RFC from 0.88 to 0.93 in the AM peak and 1.07 to 1.12 in the PM peak hour. However, there is a proposal to signalise	The latest position is set out in the Response to Local Impact Report **[REP 2-030]**: PARS 50, 51 and 59 are described as having a similar level of traffic over a longer period (4 months) as to the one-week period. The level of impact for these links are defined as "significant" in Table A16.4.2 of the **Appendix 16.4 Environmental Statement [APP-275]**. The Applicant has downgraded the impact on the basis that the worst case is for one week, whereas the impact will be same for 4 months as traffic flows are similar. It is unclear how the level of impact is reduced outside of the construction peak period of one week when the traffic flows outside of the construction peak period for four months are similar. Discussions are to be undertaken on junction mitigation.	Under Discussion

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		this junction as part of the planning application Colchester Northern Gateway South (reference 190665) that would form part of the future baseline scenario. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.11.28	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 3 of **7.11 Transport Assessment [APP-333].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed	Agreed
Transport Assessment – Approach and Methods				
3.11.29	Study Area	The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within Section 2.21 of **7.11 Transport Assessment [APP-333]**. The Study Area is considered appropriate for the assessment.	The study area is agreed.	Agreed
3.11.30	Multi-modal Strategy	A multi-modal assessment has been undertaken to examine opportunities to use rail and water-	The multi modal assessment is considered appropriate.	Agreed

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		borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within **Appendix G of 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340].** The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).		
3.11.31	Junction Capacity Assessment Methodology	Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented in Section 6.9 of **7.11 Transport Assessment [APP-333].** This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate.	Agreed	Agreed
3.11.32	Junction Modelling	The methodology used for undertaking junction assessments is presented in **S**ection 6.9 of **7.11 Transport Assessment [APP-333]**. The assessment methodology used is considered appropriate.	Accept use of JUNCTIONS 10 and LINSIG industry standard software for the junction modelling.	Agreed

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3.11.33	Impact on Parking-Inconsistencies	Within the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **7.11 Transport Assessment [APP-333]** parking impact was assessed using standard criteria but was also assessed on a site by site basis reviewing each location's characteristics. Within The **7.11 Transport Assessment [APP-333]** locations where temporary parking restrictions will be required are identified. A review against Schedule 13 within the **3.1 Draft Development Consent Order [REP4-037]** found that there are discrepancies. A review of this has been undertaken and inconsistencies will be corrected through the ERRATA being submitted at Deadline 6. There are no additional impacts in the Environmental Statement and Transport Assessment associated with these errors.	Discrepancies between text in TA and TRO Schedule for on street parking restrictions to be discussed. ECC welcomes the review by the Applicant and awaits the changes in the ES and TA.	Under Discussion
3.11.34	Existing road side facilities	The Applicant has provided in **8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]** a detailed response to paragraph 6.3.8 of the **Relevant Representation by Essex County Council [RR-1083].** The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	Discussions to be undertaken on surveys for existing road side facilities. Note suggested text for CTMP in relation to this point as set out in our response to ExQ1 **[REP3-07]** The Applicants response to this point in (**8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]**) is noted. ECC suggested text for inclusion in the CTMP in relation to this point as set out in our response to ExQ1 [**REP3-078]** at TT 1.36 and a response on this is awaited. Further discussions to be undertaken to agree a way of monitoring any impacts of HGVs parking in inappropriate locations; and	Under Discussion

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			demand/capacity of any HGV facilities on the PARs.	
3.11.35	Impact on parking	As defined in **the 6.19 Scoping Report [APP-296]**, the assessment criteria and magnitude of parking impact is based on the number of spaces lost for any period over four weeks. The assessment in the Environmental Statement indicates that the suspension of parking is expected only during arrival/departure of AIL vehicles and is therefore short-term (significance of effect has been established as not significant). Given the duration of the impact and the type of parking affected (e.g. informal kerbside parking), parking surveys were not deemed necessary. National Grid considers that parking surveys would not materially affect the assessment findings, and the resulting impact of the parking suspension. The **7.3 Ouline Construction Traffic Management Plan [Revision E]** will be updated to include the following: "Where temporary parking restrictions are required as part of a TTRO, the detail on the locations, timings and durations of these restrictions will be identified in consultation with local residents, emergency services, the relevant highways authorities and other appropriate parties. This approach will allow potentially conflicting requirements to be appropriately considered. Appropriate community liaison will also be undertaken following the approach set out in Section 6.5 of this document."	Agreed based on updated text proposed for Revision E of CTMP.	Agreed

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3.11.36	Road Safety	The Applicant assessed the impact of the Project on the Primary Access Routes (PARs) and set out **in 7.3 Outline Construction Traffic Management Plan [REP4-174]** its proposed mitigation measures, which it considers to be sufficient and proportionate. ECC has provided the following list of locations where it recommends additional road safety improvements: 1. Botney Hill Road/Farm Access 2. B1002 (between Ingatestone and Margaretting) 3. Ongar Road (near Hanging Gardens Nurseries) 4. Roxwell Road/Vicarage Road 5. B1018 nr Temple Barns 6. A134 Nayland Road, Horkesley 7. Wick Lane/Dead Lane 8. A129. 9. A414 Three Mile Hill (off A12) 10. Margaretting 11. Cuckoo Wood (A131) 12. Galleys Corner The Applicant has not identified any safety concerns at these locations as part of the assessments undertaken, or received any	Under Discussion – ECC have a number of locations on the PARs that the applicant needs to consider. ECC to provide background to the schemes and costings for the Applicant to review. Update: ECC provided the details above to the Applicant via email on 13/7/2026.	Under Discussion

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		further information on the background or costings of these schemes from ECC to date. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.37	Road Safety – Road Safety Scheme on A1060 Roxwell Road	The Applicant assessed the impact of the Project on the A1060 Roxwell Road and set out in **7.3 Outline Construction Traffic Management Plan [REP4-174]** its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant is now in discussions with Essex County Council regarding the potential new road safety scheme for the A1060 Roxwell Road that Essex County Council has highlighted in its LIR. The Applicant is also reviewing the relationship of the safety scheme to the Project. The Applicant will continue to work with Essex County Council to understand the commitment that Essex County Council is seeking in relation to the A1060 Roxwell Road.	ECC have funding to deliver these works and so funding for this scheme is no longer required.	Agreed
Transport Assessment – Mitigation Measures				
3.11.38		Traffic data and modelling files have been provided to ECC for review to allow for mitigation to be agreed. A technical note is to be provided to ECC outlining the findings of the updated modelling for those junctions where ECC raised concerns that the baseline scenario models presented in the **7.11 Transport Assessment [APP-333]** did not appear to accurately reflect	Junction mitigation to be agreed. Same comments as per ES (Item 3.11.11) as both documents are related.	Agreed

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		baseline operation (as expected by ECC) or where the future baseline highway layout will be changed as a result of improvements provided by other committed developments. The modelling and traffic flows for these will be provided to ECC for review. Further engagement with ECC to be arranged to discuss modelling results and all mitigation. With the exception of the sites discussed below as separate matters and item 3.11.11 above, ECC have raised no further concerns. The Applicant proposes this matter is moved to agreed.		
3.11.39	**Site 38 and 47**	The assessment of the junction modelling of Site 38 – Ardleigh Crown Interchange and Site 47 - A120 Coggeshall Road / Great Tey Road is presented in **7.11. Transport Assessment [APP-333].** Both junctions are expected to operate over capacity in the future scenarios that were modelled: future baseline with committed developments and future baseline with committed developments and the Project. Mitigation to reduce queues and delays has been investigated for both junctions but not yet agreed. The Applicant will continue to engage with National Highways and Essex County Council to discuss and agree the junction capacity mitigation measures at these sites. This will be captured in the final CTMP to be developed by the Main Works Contractor(s).	*As set out in ECC's LIR (**REP1-161**) "The highest queue is on the A120 (eastbound) at Ardleigh Crown Interchange with an increase of 25 vehicles both during the peak of construction and the 85th percentile peak. The existing junction is already congested based on the output included in Appendix H.4 of the Transport Assessment. Additional queues on Tey Road are shown to be made up of 18 vehicles (12 left and 6 right) in the AM peak and minimal in the PM peak during peak construction, and 7 vehicles (5 left and 2 right) based on 85th percentile flows. However, considering this is a rural lane with existing queues (and future base flows) of around 1-2 vehicles, the effect is likely to be noticeable by regular users – particularly in*	Under Discussion

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		The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	*the AM peak during the peak of construction."* *This position remains unchanged and is consistent with comments made at 3.11.23.* Discussions to be undertaken to agree junction mitigation. The junction mitigation should be included in the Outline CTMP.	
3.11.40	**Sites 48, 73, 69, 71, 74 & 82**	As mentioned in Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision E]**, it is anticipated that the Main Works Contractor(s), in partnership with the Local Highway Authority, will monitor the key junctions on the highway ntwork where temporary or permanent mitigation has not been suggested due to the anticipated limited impact of the Project construction traffic. The junctions where monitoring of the operation of the junction is proposed are identified in Table 5.9 of **7.3 Outline Construction Traffic Management Plan [REP4-174]**. Details of the modelling assessments undertaken at these junctions are presented within Section 7 of **7.11 Transport Assessment [APP-333]**. The Main Works Contractor(s) are proposing to use a delivery management / scheduling system utilising Global Positioning System (GPS) technology. This will allow the Project's Transport Coordinator(s) to record and monitor the number of vehicles passing through those junctions identified where temporary or permanent mitigation has not been suggested. A quarterly report will be prepared by the	*As set out in ECC's LIR (**REP1-161**) "Table 7.1.21 of the TA **(APP-333)**) includes junctions where monitoring of the operation of the junction is proposed (with Table 5.9 in the Outline CTMP (APP-309) showing that mitigation is yet to be agreed). ECC would welcome further discussion and confirmation around the principles of monitoring and what will be implemented if the monitoring identifies issues at the following locations:* • A120 Braintree Bypass/A131 Great Notley Bypass – monitor operation of junction and temporary signage to warn general traffic of peak hour congestion (Site 48) • A127 Southend Arterial Road/A176 Noak Hill Road – priority junction – monitor operation of junction (Site 73) • A1060 Roxwell Road/Lordship Road – roundabout – monitor operation of the junction (Site 69) • A414 Greenbury Way/Highwood Road – roundabout – monitor operation of the junction (Site 71)	Under Discussion

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		Transport Coordinator(s) and shared with the highway authority. Paragraphs 5.9.9 and 5.9.10 in the **7.3 Outline Construction Traffic Management Plan [Revision E]** provides additional detail on the junction monitoring and mitigation framework. The Applicant has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council [**RR-1083**]. **7.3 Outline Construction Traffic Management Plan [Revision E]** includes this commitment. The Applicant envisages that the routeing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum. Table 5.10 of **7.3 Outline Construction Traffic Management Plan [Revision E]** lists junctions identified for requiring further monitoring and mitigation during the construction period. See also the previous related discussion on monitoring and reporting in matter ID **3.11.23.** The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	• A176 Noak Hill Road/Wash Road – priority– monitor operation of the junction (Site 74) *A129 London Road/Mountnessing Road – priority junction – monitor operation of the junction (Site 82)"* *The commitment to the Developers Forum is welcomed but further information on the monitoring / reporting process is requested* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed. ECC have not seen Rev E of the CTMP. Discussions on junction mitigation to be undertaken. It is understood the Applicant will be including Site 69 in the junction identified in Table 5.10.	
3.11.41	**Site 58 & 63**	**7.11 Transport Assessment [APP-333]** provides details of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple	*As set out in ECC's LIR (**REP1-161**)* Two junctions that have been modelled which include mitigation in the form of temporary signage where the model predicts theoretical	Under Discussion

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		construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. It should be noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** to reduce the number of single occupancy private car trips or flexible working practices. However, the Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	congestion (RFC value is above 1.0) in the AM peak: • Site 58 - A131 Great Notley Bypass/Main Road Roundabout • Site 63- A414 Three Mile Hill/A1114 London Road Roundabout *"ECC considers a better approach would be to restrict development traffic during the AM peak particularly in the short-term worst-case construction peak where impacts are higher. A reduction in development traffic could be introduced alongside temporary signage warning of peak hour congestion and highlighting alternative appropriate routes (to be agreed with ECC) for the longer-term impact."* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement. Discussions to be undertaken to agree mitigation.	
3.11.42	**Site 63 (related to PAR 49)**	The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** for PAR 49 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction	*As set out in ECC's LIR (**REP1-161**) "Link PAR 49 includes mitigation in the form of temporary signage to warn motorists of forthcoming delays (as discussed above in relation to the junction impact at Site 63). As the driver delay for the overall link is determined as severe then ECC considers a higher level of mitigation at the junction of Site 63 is required to reduce the impact"*	Under Discussion

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		will show as a large proportional change in the assessment. The results of the modelling of Site 63 in **7.11 Transport Assessment [APP-333]** shows that the junction currently operates already at or over capacity in the future baseline scenarios and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 1.02 to 1.10 in the AM peak hour and 0.91 to 0.96 in the PM peak hour. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant on this issue is welcomed.	
3.11.43	**Sites 69, 81 & 82 (related to PARs 51 and 59)**	The Applicant will continue to engage with Essex County Council on modelling and mitigation. The assessment of driver delay and bus passenger delay in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** for PAR 51 and PAR 59 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 2% and 1% respectively) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The Applicant will continue to engage with Essex County Council on modelling and mitigation. In relation to PAR 51, Site 69 is the only junction that operates at or over capacity. The results of	*As set out in ECC's LIR (**REP1-161**) "Link PAR 51 and 59 both include junctions that are to be monitored. These are mentioned in the previous list of junctions to be monitored but is highlighted here as the links are considered as having a significant impact where mitigation is necessary.* This position on this issue remains unchanged and is consistent with comments made at 3.11.23 although further engagement with the Applicant ion this issue is welcomed ECC have not seen Rev E of the CTMP. The updates should include what options could be implemented if the monitoring shows issues. Further discussion to be undertaken to agree mitigation	Under Discussion

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		the modelling of Site 69 in **7.11 Transport Assessment [APP-333]** shows that the junction currently operates already at or over capacity during the PM peak hour and there is no predicted significant change in junction performance as a result of the Project construction flows, with changes of RFC from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour. In relation to PAR 59, the junction modelling for Site 81 indicated that there is not a predicted significant change in junction performance as a result of the Project and the junction would operate marginally over practical capacity in the PM peak hour, with an increase of the Degree of Saturation (Dos) from 91% to 93.1%. A proposal of signal time optimisation would reduce the effects. The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in available space to turn from the A129 with the addition of construction traffic. The junction will operate over capacity in the AM peak hour with an increase of RFC from 0.83 to 0.91 and at capacity in the PM peak hour with changes of RFC from 0.87 to 0.88. The Applicant is proposing to monitor the performance of this junction during construction. Paragraphs 5.9.9 and 5.9.10 in the **7.3 Outline Construction Traffic Management Plan [Revision E]** provides additional detail on the junction monitoring and mitigation framework.		

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		The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.44	**General Mitigation Measures**	**7.11 Transport Assessment [APP-333]** provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. **7.3 Outline Construction Traffic Management Plan [REP4-174]** provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for	*As set out in ECC's LIR (**REP1-161**) "ECC is of the opinion that there will be impacts on the local highway network with the level of construction traffic included. Mitigation in the form of restricting construction traffic during the peak hours needs to be explored further along with the use of sustainable transport infrastructure to reduce background traffic and offset impacts. The impacts at these junctions also highlight the importance of controls being in place to ensure that workers do not arrive/depart site during the network peak hours which is a fundamental assumption in the transport assessment undertaken, and that suitable Construction Worker Travel Plan measures for office staff who are assumed to travel in the peak hours, are also secured."* For clarity, point **3.11.11** sets out all the junctions and PARs where mitigation is to be discussed.	Agreed

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		workers arriving and departing from site, including the assessment assumptions. With exception to the discussions related to Junction Capacity Assessment, Junction Modelling, core working hours, monitoring and management of workforce (including arrivals/departures during peak hours), sustainable transport modes and proposed mitigation measures for specific locations, which is the focus of other matters in this document, the Applicant considers that the general mitigation measures are appropriate. This matter is agreed.		
Transport Assessment – Future Baseline Conditions				
3.11.45	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in Chapter 5 (Future Baseline) of **7.11 Transport Assessment [APP-333].** Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	Agreed	Agreed
3.11.46	Cumulative Developments	National Grid confirms that a review of all committed developments was undertaken prior to the submission of the **7.11 Transport Assessment [APP-333]** to the Planning Inspectorate. This submission included the majority of the committed developments subsequently listed by Essex from their review of the draft TA. Where developments were omitted,	A Technical Note was received on 23rd April 2026 relating to traffic modelling which ECC understand includes a review of committed development at relevant junctions. ECC have reviewed and are content that the committed development has been taken into account.	Agreed

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		a review has been undertaken to understand whether they should have been included. It was found that two developments would occur during the Project peak construction period: 19/01725/OUT Land North of London Road Billericay Essex and 23/02807/OUT Land West of Horizon 120 Phase 2 Horizon Boulevard Great Notley Braintree Essex. The **7.11 Transport Assessment – Appendix D – Committed Developments [APP-337]** provides an overview of the committed developments and transport schemes that were considered in the assessment of traffic on the road links forming the Primary Access Routes (PARs). Against each development a commentary has been provided as to whether it needs to be included within the assessment of traffic and transport. The Applicant has provided further details on the cumulative impacts in a Technical Note issued to ECC in April 2026. ECC confirmed via email in July 2026 that they had no further comments on this matter. Based on the above, the Applicant proposes that this matter is moved to Agreed.		
Transport Assessment – Trip Generation				
3.11.47	Key Assumptions	Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and Section 6.7 of **Chapter 6** of the **7.11 Transport Assessment [APP-333]**. The key	ECC position pending agreement on detailed comments on CTMP and CWTP.	Agreed

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		assumptions presented are considered appropriate. ECC have raised no concerns on this matter; the points raised on the CTMP and CWTP are covered elsewhere within this document. This matter is Agreed.		
3.11.48	Methodology	The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of **7.11 Transport Assessment [APP-333]** is considered suitable and robust. With the exception of mitigation details, which is focused and discussed separately on other matters of this document, the Applicant considers that the overall Methodology of **7.11 Transport Assessment [APP-333]** is robust.	The methodology is agreed in that it based on other sites. However, this is subject to receiving further detail on mitigation which has not yet been agreed and needs to be informed by experience of other sites ECC welcomes the commitment to further discussion on this issue. This point is considered agreed with the exception of the mitigation details discussed elsewhere in this document.	Agreed
3.11.49	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in Section 6.3 (Construction Vehicles Overview) of **7.11 Transport Assessment [APP-333]**. The trip generation is considered appropriate. With the exception of monitoring, management and mitigation details, which are discussed separately on other matters of this document,	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet. ECC welcomes the commitment to further discussion on this issue.	Agreed

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		the Applicant considers that the trip generation for construction vehicle trips is robust.		
3.11.50	Construction Workforce Trips	Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.4 (Construction Staff Overview) of **7.11 Transport Assessment [APP-333]**. **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** has been prepared as part of the DCO application and is contained as an appendix within the **7.3 Outline Construction Traffic Management Plan [REP4-174].** The Outline CWTP will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate. It is noted that the monitor, manage and mitigation is covered by items elsewhere so this matter is agreed.	The trip generation is based on information provided by the team which is very specific to the NSIP project and as such ECC accept the figures on the basis that they will be monitored and managed with mitigation. However, the monitor, manage and mitigation has not been agreed as yet. ECC welcomes the commitment to further discussion on this issue.	Agreed
Transport Assessment – Conclusions				
3.11.51	Overall impact of the Project	The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of the **7.11 Transport Assessment**) **[APP-333]**. The conclusions are considered appropriate. It is noted that the monitor, manage and mitigation is covered by items elsewhere so this matter is agreed.	The mitigation/management and monitoring is not agreed. ECC welcomes the commitment to further discussion on this issue.	Agreed

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Outline Construction Traffic Management Plan (CTMP				
3.11.52	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in Section 3 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**. These are considered to be clear and sufficient for the delivery of the Project.	Agreed	Agreed
3.11.53	Pre-and Post Construction Surveys	The Main Works Contractor(s) will create a record of Primary Access Routes (PARs) as part of the pre-construction conditions surveys of the existing highway network. The pre-construction condition surveys are proposed to be undertaken on all Abnormal Indivisible Load and HGV routes, as detailed in Section 5.2 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**, with the proposed methodology to be agreed with the Local Highway Authority. The results of these pre-condition surveys will be shared with the Local Highway Authority prior to works commencing, including pre-commencement works relating to the highway. Section 6.2 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]** details how post-construction condition surveys should be undertaken after construction, and the results of these and any remedial works will be discussed and agreed with the landowner and, where applicable, the relevant highway authorities, prior to handover. Paragraph 5.2.2 details that targeted condition surveys on the PARs will be undertaken on a quarterly basis during construction.	Further discussions/commitments needed on regular monitoring of road conditions extraordinary flows and maintenance liability for local highway network (including road and structures). ECC welcomes the commitment to further discussion on this issue. Further agreement needed on wording/cross reference to relevant sections of the DCO or other documents in relation to pre and post construction surveys and extraordinary flows.	Under Discussion

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		Emergency callouts are covered under item 3.11.15 within this document, and Extraordinary Maintenance is covered under 3.11.92. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.54	Traffic Management Measures	Traffic Management is set out within Section 5.8 of **7.3 Outline Construction Traffic Management Plan [REP4-174].** The Applicant's Main Works Contractor is to develop traffic management proposals including signage in accordance with the **7.3 Outline Construction Traffic Management Plan [REP4-174]** which are to be agreed with the Local Highway Authorities. As set out in Section 6.2 of the **7.3 Outline Construction Traffic Management Plan [REP4-174],** regular site checks are required to be carried out across the Project. Table 6.1 lists weekly frequency for monitoring of the road network with Transport Coordinators checking signage is in place. The visibility splays and Traffic Regulation Orders presented in the **3.1 Draft Development Consent Order [REP4-037]** have been developed to allow for some flexibility should a more semi-permanent arrangement be appropriate. Further development of traffic management associated with the works will be undertaken by the Main Works Contractor, in consultation with Essex County Council.	It is agreed that further discussions on semi-permanent traffic management will be undertaken with the Contractor.	Agreed

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3.11.55	Implementation/ Enforcement	The implementation and enforcement process set out in Section 6 of the **7.3 Outline Construction Traffic Management Plan (Revision E)** is considered to be appropriate and adequate for the Project. The Main Works Contractor(s) will include potential sanctions for persistent enforcement breaches within the final CTMP. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	Detail and discussion required regarding • enforcement measures that would be implemented by the Contractor if there were issues identified. • ECC welcomes further engagement with National Grid. • Inclusion of workers arriving/departing during peak hours as non-compliance	Under Discussion
3.11.56	Outline CTMP – Additional CTMP updates requested	The Applicant's responses to each point is as follows: • Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision E]** has been updated to address the point regarding a review of the vehicle movements against the assumptions included in Transport Assessment and the Environmental Statement. Section 5.4.18 now states '*The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within the Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4).* • The Applicant notes the request to state staff working hours and add a restriction on staff access, into the Outline Construction Traffic	ECC to review Revision E of the CTMP to understand the context of the wording changes proposed by the Applicant against the requirements set out below: • In ECC's response to ExQ1 (REP3-078) the following wording was provided to deal with the above assumptions on workers arrival/departure times: • To update paragraph 5.4.17 of the CTMP with: "The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed."	Under Discussion

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		Management Plan. Core working hours are set out in Section 2.3 of **7.3 Outline Construction Traffic Management Plan [Revision E].** Section 5.4 of this document states how construction worker LGV vehicles are to arrive and depart outside the normal highway network peak periods (i.e., 08:00-09:00 and 17:00-18:00 Monday to Friday). It is assumed that admin and office workers will arrive on site within these peak hours and therefore are accounted for in the assessment of the AM and PM peak hours presented within **7.11 Transport Assessment [APP-333]** (assumptions set out in Section 6.7). The Applicant does not consider it necessary to prescribe restrictions on staff arriving at or leaving site and considers that it would have adverse health and safety implications, for instance, in case of emergencies. • Table 6.1 of **7.3 Outline Construction raffic Management Plan [Revision E]** has been updated to include the monitoring of HGVs as within the responsibilities for the transport coordinator(s). • Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision E]** includes detail for the non compliance procedure and consultation with the Local Highway Authorities on the correct actions. • For clarity the list of items for non-compliance has been adjusted to include construction HGV movements above those included	• To update Section 2.3 Working Hours to include the following: • Staff working hours will be <INSERT> • Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs • Table 6.1 at "Monitoring of vehicles and road network" to include: • Monitoring vehicle movements of HGVs and construction workers. • ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and.or community members. We provided some suggestions as follows: • extending the programme of works to reduce the impact of traffic; • warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site;and further disciplinary actions as necessary for repeated incidents • closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or	

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		within the Transport Assessment [REP-333] and Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4 include construction deliveries The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	• Update to the list of non-compliance at Section 6.4.1 as follows: • Construction traffic (including workers) operating outside the agreed hours • The list of non-compliance at Section 6.4.1 to include: Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES	
Outline Construction Workers Travel Plan (CWTP)				
3.11.57	Policy	The Final Construction Worker Travel Plan will be developed by the Main Works Contractor(s), in collaboration with Essex County Council. The **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** has been updated to capture the commitment that the baseline survey will use the assumptions used with the Environmental Statement and the Transport Assessment. This matter is Agreed.	The Essex Travel Plan Guidance includes the requirement for baseline figure and targets to be included in the CWTP ECC would refer to its response to the Applicants comments on ECC's LIR **[APP_REP3-077]** which stated "ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2).rIt is unclear why the baseline and future targets cannot be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In our experience it seems that the Contractor tends to focus on the management documents of the DCO rather	Agreed

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			than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP."	
3.11.58	Site Accessibility Review	The Site Accessibility review is captured within Section 4 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan**. This review is appropriate for the Project.	Agreed	Agreed
3.11.59	Targets, Strategy, and Measures	The Applicant has committed in **7.3 Outline Construction Traffic Management Plan [REP5-150]** that the Main Works Contractor(s) will explore the feasibility of a mini-bus to site. This provides certainty that the Main Works Contractor(s) will give due consideration to transporting workers to site by mini-bus. The Applicant considers that this commitment aligns with paragraph 5.14.12 of Overarching National Policy Statement for Energy (EN-1), which refers to identifying opportunities to consolidate trips, opportunities for shared mobility and re-moding of travel to a more sustainable mode. Given the linear and mainly rural nature of the Project, the Applicant wishes to ensure that any shared mobility is feasible, operationally reasonable and truly effective. ECC will have the opportunity to feed into this matter further during detailed design and as part of the approval of the final CTMP, to be produced by the Main Works Contractor(s). The location of construction staff is currently unknown. Once this information becomes	Note item 3.11.61 above for targets. ECC would refer to its response to the Applicants comments on ECC's Reference to LIR **[APP_REP3-077]** which stated: "We request that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. We believe this is necessary to mitigate the impacts on the local highway network." As part of their commitment to promoting and encouraging sustainable travel and reduced parking as well as reducing single occupancy car use, ECC believe a firm statement (rather than "could include") to utilising minibuses is necessary and proportionate. This should be included in the CWTP. In this way, the commitment will ensure that the Contractor works towards implementing a scheme that is appropriate for the workforce (both shift workers and office staff) – that could mean drop off/pick up at clusters near workforce	Under Discussion

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		available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures. As noted in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, should the construction periods of other nearby projects overlap with the construction phase of the Project, discussions would be undertaken to identify opportunities to minimise the impact of the overlapping construction workforce vehicle movements on the highway network. This could include coordinated measures such as a minibus or shuttle service from local public transport hubs. Further detail will be included in the final Construction Worker Travel Plan. As also stated in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision E]**, the Travel Plan Coordinator (TPC) will act as mediator for anyone interested in car sharing. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	accommodation and/or sustainable travel hubs. The Applicant is exploring the potential for the use of nearby Park and Rides and will continue discussion with ECC on this.	
3.11.60	Targets, Strategy, and Measures	Section 7.6 of the **7.3 Outline Construction Traffic Management Plan – Appendix B -**	ECC requires confirmation that there are interventions that can be put in place as	Under Discussion

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		Outline Construction Worker Travel Plan [APP-311] sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met. The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of the **7.3 Outline Construction Traffic Management Plan [Revision E]** provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non-compliance and would follow the non-Compliance procedure in Section 6.3 of the **7.3 Outline Construction Traffic Management Plan [Revision E].** Further detail on the enforcement procedure is detailed under 3.11.55 above. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	mitigation if the assumptions do not come to fruition on mode share and associated parking numbers, number of workers and worker arrivals/departure times. The non compliance procedure sets out how mitigation will be discussed with ECC and the Contractor. ECC would expect some high level potential interventions to be included in the CWTP which would be agreed with ECC. In this way, the Contractor has clarity on the types of interventions that are expected to be agreeable with ECC and allows a starting point for discussions for agreement.	
3.11.61	Targets, Strategy, and Measures	**7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** commits the	The commitment to an action plan is welcome. However, ECC believe there should be some firm commitments that can	Under Discussion

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		Main Works Contractor(s) to prepare an action plan. Section 6.3 of this document sets out the responsibilities of the Main Works Contractor (MWC) including the development of an action plan (within the full CWTP) which focuses on the delivery of travel plan measures. The Outline Construction Worker Travel Plan [Revision F] to be submitted at Deadline 7 will include the commitment that the action plan will be developed by the Main Works Contractor(s) and include actions and commitments already identified within the Outline CWTP as well as any additional actions / commitments identified during development of the final CWTP. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	be included in an Action Plan within the Outline CWTP. This will set the framework for the Contractor to update and review as part of the detailed CWTP.	
3.11.62	Monitoring and Review	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contactor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation	As mentioned in ECC's **LIR [REP1161]** at paragraph 6.21.10, the monitoring and review should relate to the specific groups of staff so that it can be related back to the assumptions in the initial assessment. Specific questions on Monitoring and Review include: • When and how often will the mode share and parking accumulation be collected? • Why is car occupancy not included in the data collection as this will be important to understand the level of car sharing? • How will the parking be monitored?	Under Discussion

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		information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards. Section 5.2.1 of the **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** has been updated to state that construction workers associated with OHL and Cables and Substations is to achieve an occupancy rate of 2 per vehicle (as per assumptions). The updated **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** details that the vehicle occupancy factors will form part of the baseline survey targets, with the survey shared with the Local Highway Authority. This will capture the surveyed mode share from when a site is occupied. The detailed methodology and frequency on the monitoring and review will be developed by the Main Works Contractor(s) and confirmed in the final CWTP, agreed by the Local Highway Authority. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	• How will off site parking impacts be identified?	
3.11.63	Use of crew vehicles	Section 5.2 of **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [Revision**	ECC require the **CTWP [APP-311]** to include a commitment to the use of a crew vehicle for	Agreed

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		B] has been updated to confirm that the Main Works Contractor(s) will use crew vehicles for the overhead line workers travelling from compounds to sites. This matter is Agreed.	the overhead line workers travelling from compound to sites.	
3.11.64	Staff information pack	Section 7.2 of **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [REP5-151]** includes a commitment that the information pack will be issued on appointment of the contract and would be included as part of induction onto the project. This matter is Agreed.	The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site.	Agreed
Construction Access Strategy and Design				
3.11.65	Construction Access Approach	The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within Section 5 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**. This approach is considered to be suitable for construction traffic for the Project.	Construction access utilising designated routes is an agreed approach.	Agreed
3.11.66	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Construction Access Plans within Appendix C of the **7.3 Outline Construction Traffic Management Plan [APP-312 to APP-320 inclusive]**. These have been discussed with Essex County Council during regular engagement meetings since September 2023. These PARs are considered to be suitable	ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane	Agreed

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		for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the **7.3. Outline Construction Traffic Management Plan [Revision E]**. See ID **3.11.27** for discussions on Spa Road, ID **3.11.81** for discussions on Wick Lane and ID **3.11.82** for discussions on Ardleigh Road and Bentley Road. With the exception of the specific locations noted above, ECC have raised no further concerns. This matter is agreed.		
3.11.67	Construction Access and Crossover Design	The Applicant concurs with Essex County Council's stated position that – where achievable – proposed speed limits should broadly be self-enforcing. The Applicant is also aware of concerns expressed by Essex County Council relating to specific locations where it may not necessarily be practicable to achieve a self-enforcing speed limit, and will continue to engage with Essex County Council and other stakeholders as appropriate with a view to addressing such concerns. The Applicant has sought to include proposals for Traffic Regulation Orders (TROs), including where these relate to reductions in posted speed limits, in support of the safe and effective provision of site access, crossover, and mitigation proposals interfacing with the Public Highway. This approach is outlined in **7.3 Outline Construction Traffic Management Plan [REP4-174].**	ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane • Road crossings have not been assessed in the ES on the basis that there is no increase in baseline traffic along the local road. However, there will be impacts as a result of an increase in baseline traffic crossing the local road in terms of safety. ECC would expect this to be managed/agreed through the design process of the crossover and a commitment included in the CTMP – for example our request to include throttling of vehicle movements. The Applicant has not addressed the above point to date. ECC inadvertently neglected to include wording for the above in ECC's response to ExQ1 **(REP3-078**) on the CTMP. ECC would request the following is	Under Discussion

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		Construction access and crossover designs have been subject to the Road Safety Audit (RSA) process – with oversight from the relevant Local Highway Authorities for each area of the scheme – set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334].** This process included consideration of both posted speed limits and, where available, speed survey information. Survey locations are shown in **7.11 Transport Assessment – Appendix I – Figures [APP-342]** – noting that Project traffic count surveys also included the recording of speed information, as discussed in **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].** On this basis, proposed TROs are considered to broadly account for driver behaviour in a suitable and realistic manner. At crossover points, construction traffic will 'give way' to the public highway traffic and this will be signposted accordingly in line with TSRGD. At locations where temporary traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway, thus automatically throttling construction traffic. Further details can be found within the **7.3 Outline Construction Traffic Management Plan [REP4-174].** Preliminary designs of the haul road crossover points have been designed in accordance with relevant highways standards and a Stage 1	considered by the Applicant and included in the CTMP. Suggested wording in italics as follows: Update to Paragraph 5.5.10: At crossover points, construction traffic will 'give way' to the public highway traffic. At locations where temporary traffic signals are proposed, the impact of these traffic management measures will be monitored and managed, with priority given to the flow of traffic on the public highway. *Throttling of vehicle movements over the public highway should be considered as part of the design process to reduce complacency of drivers using the haul road and improve overall road safety.*	

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		Road Safety Audit undertaken to assess road safety of all road users at these locations. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion. See ID **3.11.27** for discussions on Spa Road, ID **3.11.81** for discussions on Wick Lane and ID **3.11.82** for discussions on Ardleigh Road and Bentley Road.		
3.11.68	Highway Mitigation Design	Red and orange locations as described in the **7.3 Outline Construction Traffic Management Plan [REP4-174]** for indicative highway mitigation were subjected to RSA1. Initial responses in reply to the road safety audit findings for highway mitigation and site access points were prepared by the Design Organisation and submitted to the Essex CC LHA as Overseeing Organisation back in July 2025 accompanied by the audit reports, audit briefs and drawings. These Design Organisation responses have since been updated to consider any Overseeing Organisation comments or responses received back, and these updates will be shared with the LHA setting out agreed/further action points in advance of the commencement of the stage 2 detailed design development. Yellow and green locations of highway mitigations have not been subjected to RSA1, however, those locations and summary details for each location are set out within **7.3 Outline Construction Traffic Management Plan Appendix C - Guide to the Plans and**	ECC remains in discussion with the Applicant to seek resolution in respect of a number of locations including Ardleigh Road and Wick Lane	Agreed

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		Master Key Plan [APP-312] and the **7.3 Outline Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans - Sections A to H [APP-313 to APP-320, REP4-172 and REP4-173].** See ID **3.11.27** for discussions on Spa Road, ID **3.11.81** for discussions on Wick Lane and ID **3.11.82** for discussions on Ardleigh Road and Bentley Road.		
3.11.69	Traffic Management	Any required road markings and associated signage will be designed and installed in conjunction with Traffic Signs Manual chapters, and the proposals will be subject to approval from the LHAs prior to construction commencement.	It is agreed that TM will need to be designed and installed in accordance with Traffic Signs Manual chapters and the proposals will be subject to approval through the detailed design process post DCO.	Agreed
3.11.70	Traffic Management	All temporary construction measures—such as site access points, crossing points, and any highway mitigation works—will be removed upon completion of the project, with all areas reinstated to a condition agreed with the relevant parties. Notwithstanding the above, there may be scope for the relevant local authority to approve a reinstatement condition other than previous condition/use. However, this would be subject to an assessment of environmental effects, landowner agreement and any separate planning permission resulting from a continued use or new end use. This matter would be considered outside the development consent process, since it is not a material consideration in the decision on the	On the basis of this commitment, this matter is agreed.	Agreed

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		proposed Project or a matter to be secured as part of the Development Consent Order		
3.11.71	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The Applicant would welcome further engagement with the Local Highway Authority to discuss the detail, form and durations of the draft Traffic Regulation Orders (TROs) in Schedule 13. The Applicant has conducted traffic and speed surveys in the locations of proposed Site Access Points and Crossover Points. This data has been considered within the design of these locations and the proposed implementation of any speed limit restrictions. During construction of the Site Access Points, Crossover Points and highway mitigation works, there may be works where it is not safe or practicable for the public highway to remain fully available for use. During these limited periods, the Applicant would seek to maintain access through the deployment of traffic management. Should this not be feasible or operationally reasonable, due to factors such as limited existing carriageway width, the Applicant would seek to implement a limited duration closure. In addition, short-term road closures are required for netting activities associated with the overhead line stringing. These closures are of very short duration (hours rather than days) and can occur at night, further limiting potential disruption. Due to the limited duration and occasional nature of these potential closures, the Applicant does not consider it appropriate to conduct traffic	ECC welcomes further discussion on this issue Further information is awaited following a meeting in March with the Applicant before ECC can provide comment on the TROs and this is listed together with ECC's main concerns on what has been provided to date is included in ECC's LIR **[REP1-161]** at paragraphs 4.5.104-106. It appears that there remains insufficient information to fully review the TROs and as such this item is not agreed.	Not Agreed

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		flow or speed surveys along diversion routes, in line with typical temporary road closure procedures. Given their limited carriageway width, generally the closures will be required on more minor local roads, and therefore it is anticipated that there will be a limited traffic flow impact resultant from these closures. Additionally, the use of diversion routes would not change the existing road speed conditions to trigger the requirement to obtain speed data along these routes. All works will be coordinated with the Local Highway Authority by the Main Works Contractor through the use of the permit scheme. The Applicant has and will continue to work with Essex County Council regarding the requirement for further survey work in relation to on-street parking. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.11.72	Traffic Regulation Orders and Temporary Traffic Regulation Orders	Traffic Regulation Order (TRO) durations – The works programme is yet to be finalised, along with the requirements of commencement dates, so durations of all TROs are unable to be confirmed at this time. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC maintains its position stated in its LIR **[REP1-161]** that: • the TRO should include the duration of the orders so as to fully understand the impacts • ECC refers to its response to the Applicants comments on ECC's Reference to LIR **[APP_REP3-077]** • Paragraph 4.5.106 sets out more detail on the reasoning for the requirement for	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			durations as a standard approach to TRO consultation	
3.11.73	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The **7.3 Outline Construction Traffic Management Plan [REP4-174]** sets out details and reasoning for consideration by the contractor relating to traffic management and TROs, including references to Local Highway Authority permit scheme, and lengths (distance and duration) of traffic management measures. The Applicant is preparing further information and will continue to engage with the Local Highway Authority on the reasons for the TROs. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Position from Local Impact Report: There should be a statement of reasons for the orders so that we can understand what is trying to be achieved so ECC can review against the necessary specific and relevant orders that are to be implemented and to understand the purpose (for example, restricted access) Full details of ECC's request for further information and main concerns on what has been provided to date is included in our LIR at paragraphs 4.5.104-106. A meeting was held with ECC and NG in March to discuss the TROs and the information required. NG sent through a summary of what information is available which showed there is insufficient or incomplete data for ECC to fully review the TROs.	Not Agreed
3.11.74	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The key on the **2.4 Traffic Regulation Order Plans (Sections A to H) [APP-025 to APP-032, REP4-017 and REP4-018]** presents in their Legend whether the TROs are either for temporary or permanent traffic regulation measures or restrictions. Additionally, Part 4 of Schedule 13 of the **3.1 Draft Development Consent Order [REP4-037]** lists all TROs for the Project that relate to permanent traffic regulation measures or restrictions, whereas	Having rechecked we can see the legend includes both temporary and permanent TROs. Therefore, agreed.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Parts 1 to 3 lists all TROs relating to temporary traffic regulation measures or restrictions.		
3.11.75	Traffic Regulation Orders and Temporary Traffic Regulation Orders - Enforcement	TRO enforcement – Traffic enforcement in Essex is primarily carried out by Essex Police for speed enforcement and enhancing road safety, and by Essex County Council for traffic-related services. Maintaining the TROs – The **7.3 Outline Construction Traffic Management Plan [REP4-174]** Table 6.1 provides indicative timescales and responsibility for monitoring of/checking signage, vehicles and road network. As per section 5.8 of **7.3 Outline Construction Traffic Management Plan [Revision E],** the detailed traffic management for each site will comply with the relevant standards. This will be developed by the Main Works Contractor(s) during detailed design and will be signed off by ECC as part of the RSA and permit scheme processes.	The TROs needs to be self enforcing through advanced warning signage and traffic management etc. Police have limited resources to carry out enforcement and the scheme is very large. Therefore, the TROS need to be self-enforcing through advanced warning signage and traffic management. This should be included in the CTMP.	Agreed
3.11.76	Traffic Regulation Orders and Temporary Traffic Regulation Orders – Diversion Routes	The diversion routes have been identified following typical road closure procedures, where diversion routes are of a same or better standard than that to be closed in terms of alignment, carriageway width, height and weight restrictions. Diversion routes have been selected to avoid known weak structures, the Main Works Contractor(s) will undertake a further review of the suitability of the diversion routes in line with typical road closure procedures.	If the weak structures have not been reviewed, we would suggest this is undertaken through our Structures Team to ensure there are no issues with additional traffic using the diversion routes This is on the basis that the diversion route is part of the TTRO Schedule which is to be agreed through the DCO Examination. Note diversion routes should be based on ECC's functional route hierarchy set out in the Essex Traffic Management Strategy.	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	It was agreed that the Applicant will send through the diversion routes as shapefiles to enable ECC Structures Team to review.	
3.11.77	Traffic Regulation Orders and Temporary Traffic Regulation Orders	National Grid will engage with ECC regarding a proposed mechanism described by ECC in the **Local Impact Report [REP1-161]** for reviewing road closure diversion routes. Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison of the **7.3 Outline Construction Traffic Management Plan [REP4-174]** references use and adherence of Local Highway Authority Permit Schemes, in order to best coordinate the street works required for the Project. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	A meeting was held with ECC and NG in March to discuss the TROs and the information required. NG sent through a summary of what information is available which showed there is insufficient or incomplete data for ECC to fully review the TROs.	Not Agreed
3.11.78	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]** sets out the reasoning behind decisions for the preliminary designs, being based on 85th percentile speed survey data, site-specific constraints and highway safety considerations together with other measures in combination to determine the suitable design speeds as listed with Schedule 13 of the **3.1 Draft Development Consent Order [REP4-037]** for TRO speed restrictions.	The response from the Applicant is agreed on the basis that the designs use 85th percentile speed data or the existing speed limit.	Agreed

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3.11.79	Highway Mitigation Design on National Highways Infrastructure	Further to Matter **ID 3.11.69** (Highway Mitigation Design), it has been identified that the A120(E) / Bentley Road junction (described in Section 5.9 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this proposed mitigation impacts principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.	ECC would expect input into the design but accept that National Highways would be the overseeing Organisation.	Agreed
3.11.80	Construction Access Design on National Highways Infrastructure	Further to Matter **ID 3.11.68** (Construction Access and Crossover Design), it has been identified that bellmouth TB-B059 off the A120 Colchester Road east of Coggeshall (described in Section 5.9 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]**) impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. On the basis that this access is proposed to be taken directly from the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Organisation for the Road Safety Audit in this location.	Agreed	Agreed
3.11.81	Proposed Highway Mitigation Design on Wick Lane	With regards to the safety concerns raised, we propose to install a set of 4-way traffic lights to manage construction traffic joining the public highway. This will be located;	As set out in ECC's Responses to ExQ1, comments on the Applicant's draft itinerary for the ASI & comments on any further information or submissions received by deadline 2 **([EP3-077]** to date, ECC consider	Under Discussion

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		1. On the haul road at the junction with Wick Lane, 2. On Wick Lane at the junction with the Haul road, 3. On Lodge Lane at the junction with Wick Lane, and 4. On Wick Lane at Ardleigh reservoir bridge. The decision was taken to use a traffic management solution instead of widening the lane, due to the poor forward visibility and the additional vegetation removal and land take outside of the Essex CC ownership. Our assessment of the impact of the traffic lights on movements indicates that with a 96-second cycle time, predicted queues at either end are expected to remain below 5 PCUs (Passenger Car Units), indicating sufficient capacity for the proposed construction and existing flows. This is below the limits stated within the Traffic Signs Manual Chapter 8. National Grid has undertaken a Stage 1 Road Safety Audit (RSA) on the proposals. The Local Highway Authority (Essex CC) has reviewed the Stage 1 RSA and has responded that it is content that the proposals are safe. We note Essex's concerns at this location. The Applicant's appointed Main Works Contractor is undertaking a more detailed assessment at this location. They will consider additional options as suggested by Essex County Council and will continue to engage with them on this matter.	the safe use of Wick Lane by construction traffic has not been demonstrated. The position of the Highway Authority is that Wick Lane should not therefore be used by construction traffic. Due to the constraints in both width and alignment of Wick Lane this is not something that in the opinion of the Highway Authority can be deferred for further consider post DCO.	

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		The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.82	Proposed Highway Mitigation Design on Bentley Road and Ardleigh Road	The widening scheme relating to Ardleigh Road referenced by Essex County Council is, as stated, intended to facilitate both construction and operational access to the proposed East Anglia Connection Node (EACN) Substation. The section of Ardleigh Road which would be impacted by the proposals is shown in **7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [REP4-172].** The operational requirement for retaining the full proposed width of the carriageway is based on the need to maintain a route suitable for the Transformer Delivery Abnormal Indivisible Load (AIL) (as set out under **7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Strategy [APP-310]**) in order to facilitate potential future delivery if a 'secured event' were to occur during the operational life of the proposed substation under the National Electricity Transmission System Security and Quality of Supply Standard, as noted in paragraph 2.7.12 of **7.11 Transport Assessment [APP-333]**. In developing the proposed access strategy, the Applicant considered a number of access options for the proposed EACN Substation. A summary of options is included within Table 3.19	Details still outstanding – for example, ground conditions (existing construction of Bentley Road), and remote cycle way provision (maintenance issues), Awaiting response following RSA, Designer's Response and ECC comments. ***Updated position February 2026:*** ECC require a commitment in the CTMP that a comprehensive investigation of the construction of Bentley Road will be undertaken by the Contractor to inform the subsequent detailed design for the works on Bentley Road. Our concern is whether there is sufficient depth of construction in the existing carriageway for the widening works to tie into, and that it can accommodate the volume of construction traffic. ECC's position is set out in the Deadline 3 submission at (p8 under Article 18) **[REP3-077]** in relation to maintenance issues where multiple NSIPs will be using and potentially maintaining the infrastructure installed on Bentley Road and Ardleigh Road. For clarity this is replicated below: • ECC would like to see evidence that discussions have been happening with the other DCOs Applicants. ECC has previously highlighted this point as	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		of **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. The Applicant is aware of concerns expressed by Essex County Council with respect to the permanent operational arrangement of this widened section of Ardleigh Road. The Applicant will continue to engage with Essex County Council, and other relevant stakeholders, with a view to proposing suitable measures to address the noted operational concerns in this area. The option of increasing the permanent speed limit reduction along Ardleigh Road from 30 mph to 40 mph is being explored as a modification to the Development Consent Order application. Should residual risks be identified following this increase, the Applicant shall, through future engagement with the Local Highway Authority at detailed design, consider implementing permanent highway features to safely promote self-enforcement of the reduced speed limit, whilst not impeding use of the access route by the necessary design vehicles. The two existing Public Rights of Way (PRoWs) that cross the permanent private access road between Bentley Road and Ardleigh Road cross the access road at an angle. The intention is therefore for them to be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The sections of the PRoWs to be permanently stopped up, together with the proposed alignments of their associated diversions, are shown on the **2.5 Access, Rights of Way and Public Rights of**	something that ECC is concerned with and would like to have reassurance that some form of collaborative agreement is in place between the windfarms and Norwich to Tilbury. ECC's position in relation to ensuring ground condition surveys are undertaken for Bentley Road is that a commitment is required in the CTMP. Suggested text has been included as part of the response to the Inspector's Questions (Q1). For clarity this is replicated below: • "Locations such as but not limited to Bentley Road, Ardleigh (Essex) that are proposed to be permanently provided will require a comprehensive investigation of the construction of the carriageway to inform the subsequent detailed design of the works." Further discussions on Ardleigh Road are ongoing as concerns remain about the proposed design.	

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		Navigation Plans [APP-033 to APP-040, REP4-019 and REP4-020]. As detailed design progresses, the precise alignment, length and specification of the permanent diversions and crossing will be developed in consultation with the Local Highway Authority PRoW Officer, and any resulting proposals would be in accordance with appropriate and relevant design standards. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
Abnormal Indivisible Load (AIL) Access				
3.11.83	Abnormal Indivisible Load (AIL) Access Approach	The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within Section 5 of the **7.3 Outline Construction Traffic Management Plan [REP4-174]** and further detailed within the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**. A draft version of the AIL Access Strategy was shared with Essex County Council in March 2025. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development. National Grid held a Traffic and Transport Working Group Meeting following the closure of the targeted consultations. Updates were	Principle of using designated routes on the local road network is agreed. However, details to be agreed.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		provided relating to engagement on AILS, PRoWS and highways modelling. National Grid responded to TT2.12 in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** detailing that where residual issues are identified following the structural assessments, an alternative AIL delivery route would be considered. The **7.3 Outline Construction Traffic Management Plan [REP5-149]** paragraph 5.2.2 has been updated to capture this commitment.		
3.11.84	Abnormal Indivisible Load (AIL) Access Routes	Routes proposed to be utilised by AILs are shown in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy**) **[APP-310]**. These have been developed following consultations with Essex County Council. As part of these consultations, draft route information was shared in July 2024 and April 2025. National Grid will continue to engage with Essex County Council on the proposed AIL access routes, including with respect to the ongoing structural investigations. In response to comments on the vehicle tracking .dwg file provided: H14-AIL1 - there is sufficient space available for wheel tracks to avoid edge of carriageway without the need for mitigation, the junction is a major roundabout - see tracking provided for similar routes, e.g. H13-AIL1, which shows no wheel track overrun at this location; H17-AIL1 - Mitigation required for this location,	Ongoing discussions with respect to ongoing structural investigations. Hence this point remains as under discussion. It is noted that there is highway mitigation shown for the AIL routes which will be reviewed at detailed design. Therefore, this point is dealt with.	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		denoted by constraint C36 on **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section C (Final Issue B) [REP4-172]** (Sheet 11) includes both splitter island and roundabout central island. X-ref file specified is not required for vehicle tracking review, swept paths assessed are outside of this area. The Applicant would also like to note the Main Works Contractor(s) will reassess AIL vehicle tracking at detailed design stage as part of consolidating the routes; and the regular ongoing engagement with the MWC during detailed design. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.11.85	Abnormal Indivisible Load (AIL) Access Routes	The Applicant has engaged with National Highways on the proposed routes, who have provided confirmation that the three structures listed have weight restrictions imposed, but they are above the anticipated weight of the Cable Drum AIL delivery vehicle (104 t), meaning Cable Drum and Large Mobile Crane AIL access is permitted. Therefore, the Applicant does not envisage running AIL routes through Colchester Town Centre.	Position from Local Impact Report: The AIL Strategy shows routes using the A12 strategic highway network and confirms National Grid are in discussions with National Highways. ECC have not been party to these discussions or with other stakeholders on the routes provided, save for the views given based on discussions with Essex Police above. However, it is understood that National Highways have restrictions on the A12 in the Colchester area at three locations – i) over the rail line north of A12, J27; ii) the bridge connecting the two roundabouts at the interchange of A12, J28; and iii) A120 slip	Agreed

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			road bridge over the A12. ECC is concerned that if the A12 cannot be used for the AILs then the Applicant may put forward a route through Colchester Town Centre. ECC would strongly oppose this route being used due to the level of disruption through the town and surrounding highway network. This item is agreed on the basis of the applicant's confirmation that the National Highways structures do not cause issues for delivering Cable Drums and Large Mobile Cranes and there is not a proposal for using Colchester Town Centre.	
3.11.86	Abnormal Indivisible Load (AIL) Structural Investigations	The Contractor is currently undertaking detailed structural assessments along the selected AIL routes supported by their haulage specialist. This is dependent on the availability and adequacy of existing asset records. The Contractor is aiming to complete this by the end of the Examination process, assuming all relevant information is provided from the asset owners in a timely manner. However, this will only prove the structures are acceptable at the time of the assessment and identify any mitigations required. A further review will be required closer to the planned and agreed movement schedule to ensure the AILs are still suitable.	Ongoing discussions over feasibility with respect to structural investigations.	Under Discussion
3.11.87	Abnormal Indivisible Load (AIL) Mitigation	The locations of highway mitigations along proposed AIL Routes together with summary details for each location are set out within the **7.3 Outline Construction Traffic Management**	It is accepted that RSAs will occur for the AIL Routes for detailed design. ECC request that a Position Statement is provided prior to the	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
	and Management Measures	**Plan - Appendix C - Guide to the Plans and Master Key Plan [APP-312]** and the **7.3 Outline Construction Traffic Management Plan – Appendix C - Indicative Highway Mitigation Plans - Sections A to H [APP-313 to APP-320, REP4-172 and REP4-173].** RSA1 audits have not been undertaken specifically for proposed AIL Routes in the preliminary design stage, and only undertaken on Primary Access Routes and at locations for site access points, crossing points or highway mitigation locations. Further development of the detailed design is to be undertaken, and some proposed AIL Route locations may be subject to associated stages of road safety audit. The detailed design proposals will require dialogue, approval/acceptance from the Local Highway Authority. Currently all AIL routes proposed within the DCO appear to be feasible, with or without localised mitigations. Therefore, the Applicant considers that the proposed routes are deemed suitable. If during the ESDAL process a route is found not suitable for whatever reason, a suitable alterative will be agreed and assessed with ECC and other relevant stakeholders. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	end of the Examination which sets out the latest on the various AIL routes.	
3.11.88	Abnormal Indivisible Load	Vehicle tracking swept-paths in preliminary design for A131 Beualieu Parkway at its	It is accepted that this is dealt with at Detailed Design Stage. However, we would	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
	(AIL) Mitigation and Management Measures	roundabout with Loverose Way indicates minimal impact at this location, with possible overrun of the AIL vehicle body over outer grass verge areas. The development of detailed design stage would confirm whether any impacts are anticipated in this location, and as defined within DMRB GG119, a RSA may not be required if there are no physical changes to the existing highway infrastructure. Any requirements here will be subject to dialogue and approval from the LHA. Vehicle tracking has been undertaken on all anticipated AIL routes to identify potential constraints. Proposed mitigations at each of these sites are shown in the **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans Sections A to F [REP APP-312, 313, 314, 5-153, APP-316, 317, 318, 319 and 5-154]**. The Main Works Contractor will continue engaging with ECC through detailed design, and confirm the AIL routes and constraint mitigation needed as part of the ESDAL process.	like to discuss the constraints identified in the AIL tracking provided to ECC.	
3.11.90	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The indicative AIL movements set out in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** are to be reviewed and updated in the detailed design process undertaken by the Main Works Contractor(s). It is expected that the Main Works Contractor(s) will continue liaison with the Local Highway Authorities and key stakeholders on AIL management.	Agreed	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] details that the Electronic Service Delivery for Abnormal Loads (ESDAL) system will be used to monitor and notifications be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible. As a general rule, to minimise disruption, AIL movements will be scheduled outside of peak traffic times, and in line with embargo times. The cumulative impact associated with AIL assessment would be mitigated by the use of the ESDAL system to manage any impact on the operation of the network. AILs would operate outside of peak hours and have therefore not been assessed within the **7.11 Transport Assessment [APP-333]**. The assessment within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** did not include AILs as these movements did not occur within the worst-case peak construction period identified within the trip generation. The Applicant notes the concerns raised by Essex County Council. The Contractor will liaise with the Local Highway Authority and Essex Police to confirm the AIL delivery routes and escorting requirements.		
3.11.91	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The Applicant acknowledges Essex County Council's summary of matters and will take it into account during forthcoming discussions with Essex County Council on recovering appropriate costs through a Planning Performance Agreement (PPA).	ECC have provided a number of financial requests relating to officer time (including AIL time) which we have suggested are best dealt with under s106. Our preference is s106 as there is more surety than through a PPA. Potentially the time could be captured	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant committed in 8.8.2 Applicant's Comments on **Local Impact Reports [REP2-030]** to begin discussions with the host local highway authorities and National Highways on the recovery of appropriate costs through a Planning Performance Agreement (PPA). The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	in the FHA but as it is unknown whether this will be agreed by the end of the Examination then the s106 seems the best option.	
Legal Agreements				
3.11.92	Extraordinary Maintenance	The Applicant has included a mechanism in Article 13 of the Protective Provisions which allows for reimbursement of extraordinary expenses incurred by a Local Highway Authority that can be directly attributed to the use of those highways by extraordinary traffic as a result of those highway works. Article 13 also allows The Applicant to undertake repairs at its own expense, subject to obtaining the necessary approvals and permits from the relevant Local Highway Authority. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	ECC would like to discuss the flexibility of this mechanism.	Under discussion
3.11.93	Legal Agreements	The Applicant is negotiating with Essex County Council a Framework Highways Agreement/Protective Provisions and expects the details of these to be agreed by the end of DCO examination.	A combined response on PPs has been provided by ECC/SCC/NCC (Thurrock have provided separate correspondence). ECC would prefer to agree a Framework Highways Agreement and will be sending through comments based on the latest draft between Thurrock District Council and the Applicant.	Under discussion

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3.12 Public Rights of Way (PRoW)

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
PRoW Assessment Chapter				
3.12.1	PRoW Separate Chapter	As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the Environmental Statement (ES). Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative ES chapter. Note that an **7.6 Outline Public Rights of Way Management Plan [REP4-178]** has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project.	The Applicant's position is noted. No further comment	Agreed
3.12.2	Types of PRoW	The Applicant reviewed the presence of routes with and without legal status whilst preparing the **7.6 Outline Public Rights of Way Management Plan [REP4-178]** and impacts are identified separately for each type of Right of Way, thus distinguishing between their legal status. The review concluded that there were no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway.	Having reviewed the Applicants confirmation that there are no Permissive Paths within the Order Limits and only two Other Routes with Public Access within Essex, both of which are adopted highway, ECC has no further comments and considers this matter can be moved to agreed.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.12.3	Proposed Management Regime Approach	A revised PRoW Management Plan was submitted at Deadline 5 (**7.6 Outline Public Rights of Way Management Plan [REP5-163])** which addressed design changes, as well as comments from ECC and others. This will be further updated at Deadline 7 (**7.6 Outline Public Rights of Way Management Plan [Revision D])** to capture comments from discussions with the ECC PRoW team held in July 2026. Any further requirements or comments from ECC can be incorporated during preparation of the final PRoW Management Plan to be prepared by the Main Works Contractor which will be subject to agreement with ECC and secured under Requirement 4 of the DCO. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	Further detail is required throughout several sections of the PMP specifically on speed limits, driver inductions, signage and maintenance of temporary routes. ECC considers amendments are required to be made to the PMP together with clear commitments incorporated that allow the LHA to manage the PROW and customer engagement during the construction period. ECC discussed the outstanding points to be included in the PMP with the Applicant on 7/7/26 (based on the version provided at Deadline 5). The Applicant has agreed to update the PROW Management Plan with ECC comments at Deadline 7 for review.	Under Discussion
3.12.4	Proposed Management Regime Approach	With regard to bridleways, the Applicant acknowledges discussions relating to appropriate widths where diversions are required. Following engagement with Local Highway Authority PRoW Officers, the **7.6 Outline Public Rights of Way Management Plan [REP4-178]** notes that bridleways which are constrained on both sides should be a minimum of 4 metres wide between fencing or other such constraint, to allow sufficient width for horses to turn around.	The provision of 4m wide routes where bridleways need to be diverted or fenced adjacent to haul roads has been included in the PRoW Management Plan. ECC has no further comment and considers this issue can now be moved to agreed ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed

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3.12.5	Routes with Public Access Affected by the Proposed Development	Routes with public access affected by the proposed development are shown in the **2.5 Access, Rights of Way and Public Rights of Navigation Plans Section A-H [APP-033 to APP-040, REP4-019 and REP4-020]**. Details of proposed management measures for each impacted route are shown in Section 4 of the **7.6 Outline Public Rights of Way Management Plan [REP4-178].** These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.12.3).	They have published the plans now and ECC can see that the management measures are suitably identified on each PROW. ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed
3.12.6	Reinstatement Approach	All PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with Essex County Council PRoW Officers as well as impacted landowner(s). This is set out in Section 6 of the **7.6 Outline Public Rights of Way Management Plan [REP4-178].**	On the basis that all PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken, ECC has no further comment and is of the opinion this matter can be agreed. ECC notes a revised PRoW Management Plan is to be submitted by the Applicant at Deadline 4 for review.	Agreed

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3.13 Cumulative Effects

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.13.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [Revision B]**, in accordance with the agreed methodology in **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297],** including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors because of the Project. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and has continued to do so during the Examination period, to check	ECC would refer to its Relevant Representation submitted 27 November 2025 **[RR-1083]** and its Local Impact Report **[REP1-161]** As far as ECC is aware, all relevant legislation and guidance has been complied with. It is noted that the Applicant has confirmed they will liaise with other developments (notably North Falls, Five Estuaries and Lower Thames Crossing) likely to be taking place at the same time as Norwich to Tilbury to reduce cumulative impacts. Furthermore, ECC expects the Applicant to continue to proactively undertake reviews of the planning registers and engage with any emerging projects. ECC welcomes the commitment from the Applicant to join and positively engage with a Developer's Forum to be set up by ECC with key members of the other NSIP Project Teams as well as other Strategic Site Teams, alongside Local Highway Authority and Planning Authority participation. Further information on the detailed build programme will be required for the various stages of the construction through the	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		whether there are any new relevant developments. Where this review has identified the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these have been published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate) within **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Revision A) [Revision B]**. A further update was provided at Deadline 7 in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update (Revision B)**. The Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council (commitment secured within **7.3 Outline Construction Traffic Management Plan [Revision F]**). In addition, the Applicant will provide a proportionate contribution to ECC for running the developer's forum through a planning performance agreement. With the above in mind, it is suggested that this matter could be moved to Agreed.	Construction Management Plan which will be fed into from the Developer's Forum. ECC considers that this matter can be agreed although would welcome continued engagement from the Applicant in respect of the Developer Forum and the costs associated with running it as set out in ECC's LIR [REP1-161]. ECC would also note that intra-project cumulative effects have not been addressed separately in the SOCG.	
EIA – Approach and Methods				
3.13.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.13.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.13.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. The Applicant considers these parameters and assumptions to be appropriate, proportionate and consistent with relevant EIA guidance and established assessment practice. The Applicant notes that ECC's comments relate to specific access points and routes that remain the subject of separate discussions. However, ECC has not raised any objection to the key parameters and assumptions used to inform the cumulative effects assessment itself. The Applicant has provided a response to this matter at Deadline 1 through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. Accordingly, the Applicant considers that there is no substantive disagreement regarding the key parameters and assumptions underpinning the cumulative effects assessment and therefore this matter should be recorded as Agreed.	Further information is required on a number of proposed aspects as set out in ECC's response to the targeted consultation and its Relevant Representation submitted 27 November 2025 **[RR-1083]**. ECC remains concerned that certain assumptions underpinning the cumulative effects assessment may influence the conclusions reached regarding the extent and significance of cumulative effects. In particular, there are a number of access points and routes that are not currently supported – for example Wick Lane and Ardleigh Road. These is the subject of on-going discussions therefore it is recommend that this matter remains under discussion.	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Baseline Conditions				
3.13.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280].** The baseline conditions and receptors presented are considered appropriate.	ECC considers that the baseline conditions and receptors identified for the cumulative effects assessment are satisfactory and does not raise any substantive concerns regarding their identification. ECC's concerns relate primarily to the assumptions, assessment approach and conclusions drawn from the cumulative effects assessment and mitigation proposed as a result of the assessment rather than the baseline itself.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.13.7	Embedded mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280].** Embedded mitigation measures, designed as an inherent part of the Project are therefore set out in **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4.. There remain matters outstanding including those relating to landscape and visual effects, construction working hours and disturbance as well as the highway network impacts arising from the extensive construction expected, especially in areas experiencing multiple major projects. Furthermore, ECC is concerned regarding potential for the exercise of the Limits of Deviation to result in greater cumulative effects than those assessed. ECC has made it's position on the need for mitigation for the significant impacts arising from the project throughout it's various submissions to the ExA including its LIR	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			[REP1-161] and its responses to the ExA's written questions. ECC recognises that embedded mitigation will reduce some cumulative effects, however the adequacy of that mitigation in addressing all cumulative impacts is not currently agreed.	
3.13.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]**. Standard mitigation measures during construction are summarised in **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4. As with the embedded mitigation measures, the standard mitigation relied upon within the cumulative effects assessment may not address the full extent of potential cumulative effects. There remain matters outstanding including those relating to landscape and visual effects, construction working hours and disturbance as well as the highway network impacts arising from the extensive construction expected, especially in areas experiencing multiple major projects. Furthermore, ECC is concerned regarding potential for the exercise of the Limits of Deviation to result in greater cumulative effects than those assessed. ECC has made it's position on the need for mitigation for the significant impacts arising from the project throughout it's submissions to the ExA. The adequacy of the standard mitigation package is not currently agreed, nor is it considered where matters have been	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
			proposed, that these are appropriately secured by the Applicant. This matter is therefore not agreed.	
3.13.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4. ECC considers that that the proposed mitigation does not fully address all potential cumulative effects identified during the Examination. These include construction working hours and noise, disturbance as well as the highway network impacts arising from the extensive construction expected, especially in areas experiencing multiple major projects. Furthermore, ECC is concerned regarding potential for the exercise of the Limits of Deviation to result in greater cumulative effects than those assessed. ECC has made it's position on the need for mitigation for the significant impacts arising from the project throughout it's submissions to the ExA. The adequacy of the additional mitigation package is not currently agreed, nor is it considered where matters have been proposed, that these are appropriately secured by the Applicant. This matter is therefore not agreed.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
EIA – Assessment Conclusions				
3.13.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision B].** The assessment of effects during construction presented is considered to be robust and proportionate. The assessment of Cumulative Effects undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. The Applicant acknowledges ECC's concerns regarding cumulative traffic, noise, environmental and landscape effects, particularly where multiple infrastructure projects may overlap. However, these matters have been comprehensively assessed within the Environmental Statement, including the interaction of effects across relevant environmental topics and the identification of significant cumulative effects where appropriate. The Applicant does not agree that substantially greater controls are required. Appropriate mitigation is secured through **7.2 Outline Code of Construction Practice [Revision G], 7.3 Outline Construction Traffic Management**	ECC would refer to its Relevant Representation dated 27 November 2025 Section 6.3 **[RR-1083]** and its Local Impact Report **[REP1-161]** part 4.4. ECC has concerns regarding the effect of construction traffic on the County's highway network and cumulative noise and environmental impacts. ECC is also concerned with the cumulative noise and environmental impacts arising from these developments. Taken together, especially in the Tendring area, but all along the route, the proposals have the potential to lead to significant adverse effects on communities and the environment. It is crucial that respite is offered to the communities affected by the development through reasonable working hours and construction traffic management. ECC is therefore seeking substantially better controls within the Development Consent Order and the Management Plans to ensure this respite is secured. The Applicant has not been willing to provide residents impacted by the construction sufficient levels of respite from the noise and disturbance arising from the works. This element therefore is not agreed. In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable	Not Agreed

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		Plan [Revision F] and other topic-specific management plans, which provide mechanisms for controlling construction activities, managing traffic movements, minimising disturbance and coordinating works. In relation to cumulative highway effects, the Applicant recognises the importance of ongoing coordination with other infrastructure projects and stakeholders. Accordingly, 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*'. National Grid provided a response to this matter through the relevant representations process **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and considers that the cumulative assessment appropriately captures likely effects and identifies suitable mitigation. Accordingly, the Applicant considers that this matter has been appropriately assessed and addressed through secured mitigation and ongoing coordination measures. Given ECC's position, the Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.	to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages for landscape compensation and would welcome continued engagement on this matter. A particular concern is in relation to the effect of construction traffic on the County's highway network. Minimal information is available concerning the development programme and timing for this project and how this relates to various other projects. It will be important for there to be coordination between ECC and all developers / key stakeholders for the effect on local communities to be minimised. This is addressed in more detail below within the 'Local Highway Impact' section. ECC therefore cannot agree that all cumulative construction effects have been adequately understood and mitigated.	
3.13.11	Operational (and maintenance)	The Applicant does not agree that there is an absence of information to support the assessment. The DCO Application includes the	ECC continues to provide commentary on the detail set out within the management plans, and how these are secured through the DCO	Not Agreed

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	effects	Environmental Statement, topic-specific technical assessments, secured mitigation measures and management plans, all of which have informed the assessment of operational and maintenance effects. The assessment has been undertaken on the basis of clearly defined parameters and assumptions and considers the interaction of the Project with other relevant developments in accordance with the agreed cumulative effects methodology. Furthermore, the operational mitigation and management measures relied upon by the assessment are secured through the draft DCO and associated certified documents, providing a clear and enforceable framework for implementation. The Applicant therefore considers that sufficient information has been provided to enable a full and informed assessment of operational and maintenance cumulative effects and that the conclusions presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision B]** remain robust. Accordingly, the Applicant considers this matter to have been appropriately assessed through the DCO Application documentation and supporting evidence base. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.	within is submission to the ExA. ECC does not consider it to be in a position where it can confirm the acceptability of the effects during operation (and maintenance), but it is recognised on-going discussions seek to resolve these issues.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.13.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and is appropriate for managing construction impacts from the Project.	ECC provided a detailed section within its Local Impact Report regarding Management Plans and has continued to review and provide commentary accordingly through submissions to the Examination on further revisions of Management Plans submitted. The Council remains concerned that key elements of mitigation are dependent upon post-consent surveys, assessments and management plans, reducing certainty as to the effectiveness of cumulative mitigation and the extent of cumulative effects which may ultimately arise. It is considered that this matter must remain under discussion at the Applicant continues to actively engage with ECC on the matters raised within the CoCP.	Under Discussion
Other matters as required				
3.13.13	Cumulative Impacts	The intra-cumulative assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** assessed the impacts on common receptors within **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]** in accordance with the agreed methodology in **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]**. Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental**	Cumulative impacts are clearly one of the key principle issues in the Examination. ECC is aware of a significant number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula and other NSIP schemes dependent on Norwich to Tilbury). Three NSIPs will already interact in concentrated ways in specific places in Essex, which could be exacerbated by a fourth NSIP. As set out across this response, the Norwich to Tilbury project is a catalyst and has the potential to give rise to intra-project cumulative effects in	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Statement Chapter 17 – Cumulative Effects [Revision B], in accordance with the agreed methodology in **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**, including North Falls and Five Estuaries. These effects have been transparently reported and are addressed through the embedded, standard and topic-specific mitigation measures secured through the Project. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors as a result of the Project. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025; however, since April 2025 the Applicant has been undertaking monthly reviews of planning registers and continues to do so during the Examination period, to check whether there are any new relevant developments. An assessment of inter-project cumulative effects between the Project and the Tarchon Interconnector Project, as well as an assessment of inter-project cumulative effects from clusters of developments, including from the Tarchon Interconnector project, has been undertaken and submitted to the Examination at Deadline 4, and is presented in **6.17.1**	addition to the effects arising from other strategic development projects. The cumulative effect needs to be mitigated and compensated. However, without the necessary mitigation and compensation provided by the Applicant and appropriately secured through the DCO, this matter is moved to not agreed. For example, the Applicant's position here notes that "The assessment concluded that significant effects would be experienced on landscape (construction)" – however the Applicant is also disputing the need for appropriate landscape compensation measures. ECC would also reiterate the need for the Applicant to engage in the Developers Forum – whilst the Applicant's commitment is noted, there remain matters to be resolved including the Forums remit, terms of reference and funding.	

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		Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163] (see ID DCO15). The Applicant therefore considers that the cumulative assessment provides a robust, up-to-date and comprehensive assessment of likely cumulative effects. Accordingly, the Applicant considers that cumulative effects have been appropriately assessed and addressed through the DCO Application, supporting assessments and secured mitigation measures. The Applicant therefore considers this matter to be Agreed in respect of the assessment methodology, evidence base and consideration of cumulative effects. If ECC's concern relates to separate discussions on mitigation or compensation, those matters should be addressed under the relevant topic-specific entries rather than this assessment matter.		

3.14 Development Consent Order

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

3.14.2 This table contains the views of the Applicant and ECC 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.

3.14.3 The Applicant and ECC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis many matters are retained as Under Discussion.

3.14.4 The parties recognise that work and engagement surrounding the proposed DESNZ unit for the purposes of discharging requirements under the 3.1 Draft DCO is ongoing through written submissions and following discussions at the DCO Issue Specific Hearing (ISH3). On the basis that this work and engagement is ongoing, the parties do not repeat those issues in this SoCG.

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.14.1	DCO Requirements - Interpretation	The Applicant notes the Council's request for the definition of "reinstatement planting" to distinguish between replacement planting and what constitutes mitigation and compensation planting, but does not agree that there is any need for terms to be distinguished within the definition of reinstatement, as the definition already refers back to the Outline (or final) Landscape and Ecological Management Plan where necessary terms are explained. Notwithstanding this, the Applicant has amended **3.1 Draft DCO [REP5-060]** to expressly include "planting associated with the 3:1 tree planting commitment (to the extent it is to be provided within the Order limits)" within the scope of reinstatement planting. This amendment provides additional clarity as to the treatment of planting delivered pursuant to the 3:1 tree planting commitment. The definition otherwise mirrors the approach adopted in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Requirement 1 - Interpretation The definition of reinstatement planting needs to distinguish between replacement planting and what constitutes mitigation and compensation planting.	Not Agreed
3.14.2	DCO Requirements – Stages of authorised development	The Applicant has updated references to "days" to become references to "business days" throughout **3.1 Draft DCO [REP5-060].** However, it is not appropriate to do a straight swap in all instances, hence some of the	Requirement 3 - Stages of authorised development Paragraph 3(1) should refer to "seven business days" to ensure consistency across the dDCO.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		numbers have also been adjusted to provide a 'business day' equivalent period. The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) 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 [REP5-060].** The Applicant cannot accept submissions under Requirement 3(2) being for approval by the relevant planning authority. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030. The Applicant does not consider it necessary to provide a timescale on prior notice under paragraph 3(a). The approach in **3.1 Draft DCO [REP5-060]** is consistent with that in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	ECC's view is that submissions under this article to the relevant planning authority should be for approval as opposed to notification given the scale of the project and potential for cumulative impacts arising from the project. ECC thus requests that paragraph 3(1) is amended and "for approval" is added at end of the text at 3(2). Paragraph 3(a) makes reference to "any revisions to the written scheme referred to in sub-paragraph (2) above must be submitted to the relevant planning authority in advance of the commencement of the stage of the authorised development to which the revisions relate" To avoid confusion and dispute, this paragraph should specify how far in advance this should be provided to the relevant planning authority to ensure they have due notice. In respect of Paragraph 4 and the reference to 28 days, ECC requests the term 'days' is defined with Requirement 1.	

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.14.3	DCO Requirements – Construction environmental management plans	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision D]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]** are provided as appendices of **7.2 Outline Code of Construction Practice [Revision G]** and includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO [REP5-060]**. Requirement 1(2) to the **3.1 Draft DCO [REP5-060]** provides that '*Where under any of the requirements the approval or agreement of the relevant planning authority or the relevant highway authority is required, that approval or agreement must be given in writing*.' It is not necessary to specify that this provision refers to the approved outline management plans as these are certified documents under Schedule 19. Appendix A of **1.3 Guide to the Application [Revision K]** provides a master document list and revision history of all submission documents which are available on the Planning	ECC notes the explanation from the Applicant why it has not submitted a Construction Environment Management Plan ("CEMP"). However, the Bramford to Twinsted DCO requires a plan and there continues to be a lack of clarity that a Code of Construction Practice (which is proposed) will provide the same sorts of protections as a CEMP. If it is intended to do so, in particular because of various outline plans appended to it, that should be made clear by the outline plans being listed. Furthermore, there are additional management plans which should be secured via this dDCO which needs to be addressed by the Applicant. This matter has been raised by the ExA as part of the Rule 17 letter dated 30 June 2026. At Paragraph 4(2), any agreement under this clause should be made in writing. Paragraph 4(3) should refer to the approved outline management plans. As above any agreement should be made in writing. Furthermore, there should be a record of how amendments and updates will be captured and recorded to ensure transparency. This matter must remain under discussion at this stage.	Under Discussion

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		Inspectorate's website. Any documents submitted to discharge Requirements post-consent will be available on the relevant planning authority's website. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	ECC is not clear what the clarifications and amendments are to this matter. These matters therefore remain unresolved and under discussion. Unfortunately, ECC cannot confirm this is agreed as the applicant sets out within their position.	
3.14.3a	DCO Requirements – Construction environmental management plans consultees	The Applicant notes the comment that additional consultees, such as the Local Highway Authority, should also be included in relation to the discharge of Requirement 4 (Construction management plans). The Applicant has updated **3.1 Draft DCO [REP5-060]** to include the local highway authority and the relevant highway authority as a named consultee in the context of the strategic road network and the Environment Agency in respect of the code of construction practice. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Reference is made to "Natural England" within Paragraph 4(1) – however there are many stakeholders who should also be engaged in consultation on these management plans which should be reflected within this requirement, including the Local Highway Authority for example and ECC awaits the outcome of the Applicant's review and sight of the DCO at Deadline 5.	Under Discussion
3.14.4	DCO Requirements – Archaeology	The Applicant has submitted **8.9.1 Applicant's Response to First Written Questions – Corrected Response to Question DCO 1.S8 [AS-090]**, comprising a discussion draft of Requirement 5 showing how it would appear should all amendments proposed by the host authorities and Historic England be accepted.	Requirement 5 – Archaeology As raised within ECC'S Deadline 6 response, The revised DCO wording for Requirement 5 (Archaeology) has included a new part (6) which satisfies the recommendations requested by ECC to ensure the delivery of an adequate programme of post-excavation	Under Discussion

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		The Applicant has updated **3.1 Draft DCO [REP5-060]** to: • Provide for the approval of written scheme of investigation (WSI) for evaluation works • Clarify for consistency with the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** (OAMS-OWSI) that a preservation in situ management plan would, if relevant, form part of a detailed written scheme of investigation as opposed to being separate • Provide that evaluation works must be carried out in accordance with the WSI referred to above • Set out the process for post-excavation assessment, approval of an archaeological updated project design, post-excavation analysis, publication and archiving. The Applicant has retained its original wording regarding pre-commencement operations being carried out in accordance with the OAMS-OWSI because it remains concerned that a blanket prohibition on site preparation works would prevent anything being done on site that would, even to the smallest degree, break the surface of the ground. This could include activities as de minimis as the erection of a fence post. Whilst the Applicant recognises the need to ensure that buried archaeology is suitably preserved, its position is that in the context of a project of CNP, a blanket prohibition is disproportionate and	works and publication. The wording of Requirement 5(6) is considered acceptable. The re-worded sections (parts 1 to 3) have tried to incorporate the various requests of the relevant planning authorities to provide suitable re-wording for the DCO. However, the result is that the new proposed wording is confusing and does not reflect the proposals put forward by ECC which was to provide a distinction between the undertaking of the archaeological evaluation works and the subsequent mitigation works. This was to facilitate a clear process for the discharge of condition procedures. The DCO wording has been discussed previously with the relevant county archaeological officers, comments were prepared for the Second Hearing regarding Requirement 5 however they were not delivered during the Hearing. It is recommended that the wording provided by Suffolk County Council for the Hearing be adopted rather than repeat or provide alternatives at this stage of the application. Following their rationale would lead to fewer subsections and ensure greater clarity for discharge of conditions. ECC would recommend that this matter remains under discussion at this stage.	

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		unnecessary. The Applicant considers that the measures set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, together with its identification of priority areas and the extensive trial trenching that it has already carried out to date, would ensure the adequate protection of buried archaeology during pre-commencement works. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** has been updated following two rounds of consultation with Historic England and the archaeological advisors to the Local Planning Authorities since submission of the document to the Planning Inspectorate with the DCO Application for the Project. The Applicant considers that this document provides suitable processes, measures and controls to ensure the appropriate completion of evaluation and undertaking of mitigation for the Project, in line with the Applicant's responsibilities in NPS EN-1. The provisions of the OAMS-OWSI regarding unexpected finds during construction also apply to the pre-commencement works.The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.14.5	DCO Requirements – Design and layout plans (elevations)	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such	Requirement 6 – Design and layout plans (elevations) ECC remains concerned with the use of "general accordance" and the subjectivity that	Not Agreed

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		final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft DCO [REP5-060]**. As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of **3.1 Draft DCO [REP5-060]** The Applicant notes the Council's comments regarding concerns with the limits of deviation, but reiterates that the limits of deviation have been assessed as part of the Environmental Statement and therefore restrictions to the limits of deviation are not necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	would be involved in the assessment of whether any materially new or materially different environmental effects from those identified in the environmental statement have occurred which informs "general accordance". No explicit consideration is given to how some areas may be more sensitive to departures than others. The ES generally assumes the pylons as in the midline of the Limits of Deviation shown on the work plans. If a pylon is subsequently moved within those limits of deviation and closer to a receptor, but also higher, then there is likely to be a negative impact on said receptor experience of the development hence the concerns regarding the term "general accordance" and the desire to restrict the limits of deviation expressed. ECC also considers that the host local planning authority should have a say in whether any changes from the design and layout plans give rise to any materially new or materially different environmental effects from those identified in the environmental statement. As such, the wording of paragraph 6(2) should be updated: The authorised development will not be in substantial accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) in the opinion of the Local Planning Authority gives rise to any materially new or materially different effects…	

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			ECC considers this could operate by way of a time limited prior approval process similar to that in effect for many areas of the TCPA regime. ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	
3.14.6	DCO Requirements – Construction hours	The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and further explained why reduced working hours would not be sufficient to deliver this Project by the end of 2030 to DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**. The Applicant considers the provision for start-up and close-down activities 1 hour either side of the core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation These activities do not typically involve the operation of heavy machinery, require HGV deliveries, or generate significant noise, dust, or vibration, and therefore are not nuisance generating activities. All activities taking place on-site remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects	ECC continues to express concern regarding the drafting of Requirement 7 relating Construction Hours. ECC has provided detailed commentary on respect of ExQ2 DCO 2.S10 on the what it considers to be more appropriate wording for this requirement. This includes opportunity for respite for affected communities, limiting works on Sundays and Bank Holidays. Without amendments to this requirement to respond to these concerns, and give residents and local residents some respite, this matter is not agreed.	Not Agreed

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		as set out in **7.2 Outline Code of Construction Practice [Revision G]**. In respect of noise impacts, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 – Part 1: Noise28, and as detailed in Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]**. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects as per commitment NV05 within Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.14.7	DCO Requirements – Reinstatement schemes	The Applicant has updated the references in **3.1 Draft DCO [REP5-060]** to refer to "former condition" instead of "former use". The Applicant felt that the use of "and appearance of the land" in the Council's proposed definition of "former use" would satisfy the tests of precision and could potentially cause problems with compliance (for example if planting was required).	Requirement 10 – Reinstatement schemes ECC notes the repeated reference to 'former use' within this part of the DCO and questions whether this should be defined to ensure that there is clarity around what is considered a 'former use' of a site. There needs to be clarity around who determines what the former use of a site, alongside any enforcement actions around this. It is therefore suggested that 'former use' is	Under Discussion

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		The presence of underground cables affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanked requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	defined as "the condition and appearance of the land prior to the commencement of the development" Requirement 10(2) – ECC notes the exclusion from the reinstatement requirement of land within 10 metres of any underground cables. It would be helpful to clarify what will happen to this land. ECC has requested confirmation from the Applicant as to the clarifications and amendment that have been made. At present, this has not been received and therefore the matter remains under discussion as opposed to agreed.	
3.14.8	DCO Requirements – Decommissioning	Decommissioning has been scoped out of the Environmental Statement as per **6.20 Scoping Opinion [APP-297]** and the **3.1 Draft DCO [REP5-060]** reflects this (in that the definition of 'maintain' in Article 2(1) allows for the removal of part, but not all, of the authorised development). The Applicant's position normally in relation to promotion of Development Consent Orders is that decommissioning is not anticipated given the design life of the development and the continuing need for the transmission network to operate. However, all appropriate consents	Requirement 13 – Decommissioning ECC would welcome more detail around the decommissioning process, especially any impacts arising on communities and the local environment. There is an expectation for restoration to contribute to sustainable land stewardship, climate change mitigation and adaptation, biodiversity and environmental net gain through the delivery of natural GI. If the restoration proposal is to return the site to	Not Agreed

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		would be sought at the relevant time if decommissioning was in fact subsequently required in future. The Applicant acknowledges the concerns raised regarding the retention of infrastructure that is no longer required for operational purposes. As the licensed electricity transmission owner, the Applicant has statutory duties to develop, maintain and operate an efficient, coordinated and economical transmission system. Decisions regarding the continued retention, replacement or removal of assets are therefore subject to ongoing technical, operational and regulatory review throughout the life of the network. Where infrastructure is formally decommissioned and its removal is considered appropriate, Requirement 13 (decommissioning) will be engaged and decommissioning activities would need to be undertaken in accordance with the relevant statutory, regulatory and environmental requirements applicable at the time. However, it is not necessary, nor appropriate for the DCO to extend control over the lifecycle management of operational transmission assets, which is governed through a separate, well-established statutory and regulatory framework. Therefore, the Applicant does not consider that additional controls within **3.1 Draft DCO [REP5-060]** are either necessary or appropriate.	arable land it will need to a better grade than before and demonstrate how it will deliver sustainable land stewardship with potential to link to Landscape recovery. ECC would also wish to refer to its response to ExQ2 DCO 2.S12 in respect of decommissioning. The Council has reviewed Requirement 13 (Decommissioning) and maintains its position, as previously set out in its submissions, that the current drafting does not provide sufficient certainty that obsolete infrastructure will be removed in a timely or consistent manner. The Council therefore considers that an additional or revised requirement should be included within the DCO to secure the following: A mandatory obligation on the undertaker to identify and remove any pre-existing equipment within the Order Limits • which is not required to enable, facilitate or support the authorised development, or any other ongoing operational use by the undertaker; • A requirement for such equipment to be removed within a defined period (for example, within 12 months of completion of the relevant part of the authorised development), in accordance with an approved land restoration scheme; • A mandatory obligation on the undertaker to notify the relevant planning authority as	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	and when any part of the authorised development or associated infrastructure becomes obsolete; and • A requirement for decommissioning and restoration of such obsolete infrastructure to be carried out in accordance with Requirement 13 (or equivalent), following approval of a written scheme. ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	
3.14.9	DCO Requirements – Applications made under requirements	The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's	The process and timeframes across the DCO must be sufficient for the relevant local authority to consider, undertake the necessary checks, engage with relevant stakeholders and respond to such applications submitted to it. At Paragraph 1(1) LPA's are required to give notice of their decision on the discharge of requirements within 28 days. This is considered too short given the available resources and the processes involved in the discharge of Requirements, some of which will no doubt be complex and supported (properly) by a lot of detailed information. This period should be extended to at least 56 days. This is consistent with the statutory determination period for the discharge of conditions under the TCPA regime. In addition, at Paragraph 1(1)(b) where further information is required, the Clause should be altered from the day immediately following the	Not Agreed

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		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 paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of **3.1 Draft DCO [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. In any case, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure Essex County Council, and other relevant host authorities, are able to respond on programme.	date the information was supplied by the undertaker to the day after the receipt by the local planning authority of the further information. ECC remains concerned with the timeframes offered by the Applicant in respect of the discharge of requirements.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.14.10	DCO Requirements – Further information	Given the Project's status as a project of critical national importance, the Applicant considers five business days for the relevant discharging authority to request additional information to be proportionate and appropriate. The Applicant has updated **3.1 Draft DCO [REP5-060]** to replace the five-day period for the request of further information to five 'business days' for consistency of terminology. This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21-day period for notification of further information requested by a requirement consultee with an equivalent period of 15 'business days'. Paragraph 2(4) of Schedule 4 to **3.1 Draft DCO [REP5-060]** allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary. The Applicant expects to provide further information electronically, so the submission and receipt of the information is expected to occur at the same time in practical terms. It is therefore not anticipated that there is any merit in amending the drafting here.	At Paragraph 2 (2), the timescale should be increased to at least seven business days consistent with that specified in the Bramford to Twinstead DCO. At Paragraph 2 (3) the timescales for the local planning authority to issue the consultation following the receipt of information / additional information should be increased to ten business days. In addition, the backstop date by which the relevant authority must notify the undertaker should be increased to ten business days after the 21-day consultation period or the receipt of the Requirement Consultees response requesting the need for additional information. This is to reflect the pressure on resources of likely required consultees and to the relevant authority having to seek an extension. The burden on LPA's could be further reduced if the Undertaker were to notify the Requirement Consultee directly at same time as LPA so ECC. suggests discussion with the Applicant as to how that could work. ECC is concerned about the process where the supplied information is not acceptable. While Schedule 4 paragraphs 2 and 3 deals with some aspects of that, it does not address circumstances where ECC only knows what further information is required once it has	Not Agreed

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		The Applicant notes the point raised on notification of consultees and has updated **3.1 Draft DCO [REP5-060]** accordingly. The Applicant considers that the existing drafting provides appropriate flexibility, however the Applicant recognises that a mutually agreed position in respect to timescales has not been reached, and therefore the matter is recorded as Not Agreed.	received comments from consultees. and does not address the issue. It is therefore suggested that: • In Schedule 4 Paragraph 2, replace," the relevant authority must, within 5 days of receipt of the application" with "the relevant authority must, within 21 days of receipt of the application; • In Schedule 4 Paragraph 3 delete "and in any event within 21 days of the receipt of the application" is deleted from Paragraph 3 of this Schedule. • ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	
3.14.11	DCO Requirements - Fees	The Applicant has updated the proposed fee to align with the current national guidance in **3.1 Draft DCO [REP5-060]**. The Applicant has prepared a draft post-consent Planning Performance Agreement (PPA) which has been shared with ECC to deal with matters relating to post-consent working, including cost recovery. The Applicant would reimburse the host authorities for reasonably and properly incurred costs in progressing the agreed workstreams, as it has done for the Application Stage planning performance agreements. In relation to fee retentions, the Applicant will consider a revised alternative drafting to **3.1. Draft DCO [REP5-060]**, which would provide that where an application is rejected as invalid,	ECC is giving further consideration to what the specified fee at part 3(b) should be and its relationship to prescribed fees and any post consent PPA and will update the Applicant and the ExA as soon as practicable. With regard to ECC's point concerning the retention of 20% of the application fee should it be necessary to proposed a refund, taking into account the desire on both parties to enter into a post consent PPA which would ensure the Council's costs are covered, ECC is prepared to accept proposed revised alternative drafting to Para 3(2)) of the DCO and the proposal that Councils would retain the fee for its use against a future application to discharge a requirement of the DCO.	Not Agreed

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		the relevant authority may retain the fee and credit it against a future application to discharge a requirement. This approach is akin to the arrangements under the Town and Country Planning Act 1990 regime, whereby an applicant is not required to pay a second fee when resubmitting a valid application for the same matter following the rejection of an earlier application as invalid. With regard to the indexation of planning fees, The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (the '2012 Regulations') set out the fees prescribed under sections 303 and 333(2A) of the 1990 Act, to which the Applicant refers in paragraph 3(1)(a) of Schedule 4. The 2012 Regulations were amended by the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023 (the '2023 Regulations'). The 2023 Regulations inserted Regulation 18A into the 2012 Regulations. Regulation 18A is 'fees payable on or after 1st April 2025' and it provides for increases in fees in line with Consumer Prices Index or 10% (whichever is lower). The increase applies in respect of an application that is made on or after the fee change date (i.e. 1 April of the relevant year from 2025 onwards). By referring in general terms to 'such fee as may be prescribed', Schedule 4 to **3.1 Draft DCO [REP5-060]**	With regard to the indexation of planning fees, ECC remains of the opinion that the fee for any application to discharge a requirement of the DCO must be updated annually to reflect the basic costs of the discharging authority and ensure any fee payable remains in line with aforementioned fee Regulations or the latest planning fee guidance at the time of submission. While the reference to Bramford to Twinstead and Yorkshire Green DCO is noted, the annual increase in planning fees did not come into effect until 1st April 2025 post the decision date for these examples and while the associated legislation does not directly relate to NSIP applications, the Council would argue the principle is also applicable to applications for the discharge of requirements given the similarity to the process associated with the approval of conditions pursuant to a TCPA decision. The increase in application fee would also run alongside the annual increase in staff costs that are normally applied to any PPA arrangement. As currently structured therefore, and notwithstanding our revised position in respect of the fee retention, we would suggest 3.14.111 is therefore moved to Not Agreed. In addition, it is considered the period within which the application has to be determined should be increased to 42 days, as should the period for the refund. This more realistically	

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		already accounts for the annual increase in the application fee and the Applicant does not consider it necessary to make further amendments. In light of the above, the Applicant considers that the fees are already subject to indexation, and therefore does not consider it necessary to include a separate index-linking mechanism. This approach is consistent with recently made development consent orders, for example, the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	reflects the processing time which will be needed to carry out the necessary consultation key consultees and for them to consider the submitted information which on a project of this scale will no doubt be extensive and detailed. This situation is further exacerbated by the number of DCO's may LPA's are currently having to process. As the DCO is currently structured there is no commitment to an annual increase with one of the options available linked to a fixed fee of £298 unless otherwise agreed. Therefore, and notwithstanding our revised position in respect of the fee retention, we would suggest 3.14.111 is therefore moved to Not Agreed.	
3.14.12	DCO Requirements – Certified documents	**7.2 Outline Code of Construction Practice [Revision G]** secures a number of measures that would robustly control the construction and operation of the Project in terms of works to watercourses, land drainage, surface water drainage and pollution risks. It is therefore not considered necessary that **7.9 Flood Risk Assessment [APP-331]** becomes a certified document. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The Lead Local Flood Authority ("LLFA") is concerned that the dDCO, Draft Schedule of Requirements and Explanatory Memorandum do not highlight the existing flood risk, the need for managing said risk and/or the presence of overland flows. This issue is relevant for both pre and post construction. ECC suggests that the Flood Risk Assessment and the Surface Water Management Principles document be listed as 'CERTIFIED DOCUMENTS' of the DCO and that the Construction Environmental Management Plan is drafted to control works that affect ordinary watercourses/drainage	Not Agreed

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			channels, surface water drainage, and the control of pollutants.	
3.14.13	DCO Requirements – Additional requirements (Register of requirements)	The Applicant has prepared drafting to be included in **3.1 Draft DCO [REP5-060]** 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. 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 ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Given the scale and complexity of the project across multiple areas, ECC would encourage that the DCO requires the Applicant to maintain a 'Register of Requirements' to ensure ongoing fairness, public confidence and transparency. Additionally, to ensure the timeliness and efficiency of the discharge of requirements process this should include all relevant certified plans and documents that will be required to undertake the assessment of the submitted requirement material. ECC considers that this matter remains under discussion at this time.	Under Discussion
3.14.14	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	A post-consent programme of ecological mitigation measures and a BNG delivery plan will both need to be secured through the dDCO Requirements.	Under Discussion

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		Biodiversity Metric and methodology will not change from that assessed in **7.1 Biodiversity Net Gain Report [Revision B].** Updates to the BNG Assessment and details of offsite BNG will be secured through Requirement 11. Off-site biodiversity units will be 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 remains committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion..	Is suggested that this matter remains under discussion given the proposed inclusion of a requirement for BNG. ECC will engage with the Applicant accordingly. ECC wishes this to remain under discussion.	
3.14.15	DCO Requirements – Additional requirements (Developer's forum)	The Applicant notes the concern about the cumulative effects of the project with other NSIPs and other major infrastructure projects and has committed in **7.3 Outline Construction Traffic Management Plan [Revision F]** to join and actively engage with a Developers Forum	To manage the cumulative impacts arising from this scheme, ECC is seeking the establishment of a Developers Forum. This should be in place to monitor and manage the impacts arising from this and other nationally and strategic developments in Essex. ECC	Under Discussion

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		established by Essex County Council, subject to agreement of suitable terms of reference, to support ongoing coordination between major developments. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	would wish to see further commitments from the Applicant on this matter. This matter should remain under discussion given ongoing engagement on this topic.	
3.14.16	DCO Requirements – Additional requirements (HGV parking)	The Applicant has prepared **7.3 Outline Construction Traffic Management Plan [Revision F]** which includes details of proposed management and mitigation measures associated with construction traffic, including Heavy Goods Vehicle (HGV) drivers not adhering to the agreed routes or HGVs drivers parking or waiting on the highway in inappropriate locations. With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to engage with the local authorities on this matter.	There is a need for surveys to be carried out and mitigation agreed before the commencement of works for HGV parking. ECC recommends that this is either captured within an appropriate management plan, or through an additional requirement and would welcome discussions with the Applicant on this matter accordingly.	Under Discussion
3.14.17	DCO Requirements – Additional requirements (Employment and skills plan)	As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [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	ECC welcomes a requirement in the DCO which requires an Employment and Skills Plan to be submitted. ECC however considers it important that the Plan is submitted to the relevant local authorities for approval prior to commencement of construction as a mechanism to secure legacy benefits from the development. ECC has provided commentary to the Applicant on the Plan at Deadline 6 and would d welcome further engagement with the Applicant on the detail	Under Discussion

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		employment, skills, training and supply chain engagement during construction of the Project. The commitment to implementing the project in accordance with an Employment and Skills Plan has been secured by way of a new DCO Requirement (Requirement 15) in **3.1 Draft DCO [REP5-060]**, however the matter of whether the Requirement should also secure approval of the Plan before implementation remains under discussion	It is therefore considered this matter should remain under discussion, ECC is awaiting the revised DCO wording which will secure that the Strategy is submitted to relevant local authority's for approval. Furthermore, ECC has raised considerable comment on the strategy itself.	
3.14.18	DCO Requirements – Additional requirements (Health and wellbeing mitigation strategy)	Mitigation measures for health and wellbeing will be secured via Requirement 7 (management plans) of **3.1 Draft DCO [REP5-060]**, and there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]**. The Applicant considers that these matters fall outside the development consent process and are not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The dDCO should include a standalone Health and Wellbeing mitigation strategy and a health and wellbeing monitoring plan. ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed	Not Agreed
3.14.19	DCO Requirements – Additional requirements (Green	The Applicant supports the delivery of Environmental Net Gain including Green Infrastructure and will consider whether there are any opportunities to deliver further enhancement.	ECC recommends an additional requirement regarding a Green Infrastructure (GI) Strategy to address the alignment between measures set out in the OLEMP **[APP-321]** and BNG Report **[APP-299]**.	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
	infrastructure strategy)	In relation to the addition of a requirement to monitor and report on BNG and Green Infrastructure delivery, **7.1 Biodiversity Net Gain Report [Revision B]** includes a commitment to undertake monitoring for a period of 30 years with details to be set out in a habitat management and monitoring plan. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** also provides for monitoring. The Applicant notes that the ecological enhancements identified within the Environmental Statement, including those that do not contribute directly to the biodiversity metric, form part of the wider mitigation, compensation and enhancement measures which will be taken forward through detailed design and implementation, as appropriate. The Applicant considers that the existing commitments contained within the Biodiversity Net Gain Report and OLEMP provide an appropriate mechanism for securing the delivery, management and monitoring of biodiversity and wider Green Infrastructure measures. Therefore, the Applicant does not consider that an additional requirement is necessary.	Additionally, the Environment Statement recommend other ecological enhancements not captured by the metric, such as bird and bat boxes and habitat piles. These enhancement and mitigation measure identified are instrumental in contributing to producing quality GI therefore all these GI threads should be carried through to detail stages of the application and secured through a suitably worded Requirement. ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed	
3.14.20	DCO Requirements – Additional requirements (Ecology working group)	The Applicant has updated **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to align the remit of the Ecology Working Group to the suggested text within paragraph 2.3.1 of **Suffolk Wildlife Trust's Written Representations [REP1-278].**	ECC has recommended that the formation and remit of an Ecology Working Group is secured in a separate requirement and has provided draft requirement wording / Terms of Reference in Appendix 4 to Comments on any further information or submissions received by deadline 4 [REP5-243].	Not Agreed

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		The Applicant therefore considers that the purpose, scope and operation of the Ecology Working Group are secured through Requirement 4 of **3.1 Draft DCO [REP5-060]** and a separate requirement is not necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	ECC would also support the expansion of this Group to include Landscape ECC recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed	
3.14.21	DCO Requirements – Submissions for discharge of requirements	Those Requirements that require the submission of substantive documents specify the required content of these documents. In particular, any submissions under Requirement 4 must be in substantial accordance with the relevant outline management plan, which ensures that the relevant authorities are aware of the nature of the submission they will receive and which will support effective and efficient processing. The Applicant is committed to continue discussions with ECC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	The content and quality of any submission for the discharge of requirements must be to an agreed standard to support efficient processing. ECC wishes for this matter to remain under discussion. It is not clear what the additional clarification has been offered to ECC for this matter to be considered agreed.	Under Discussion

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3.15 Other Matters

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
3.15.1	Climate Change	ECC comments provided on 10th July 2026 are noted, and National Grid will continue to engage with ECC on this matter noting that further clarity on the ECC position has been provided. x The Applicant notes that at submission a Site Waste Management Plan was submitted as an appendix to the outline CoCP, an outline Construction Traffic Management Plan was submitted, and a Greenhouse Gas Reduction Strategy also forms an appendix to the submitted oCoCP. The Applicant has held regular engagement on construction traffic management leading up to and post submission of the DCO application. ECC were also invited to comment on the oSWMP and to date no feedback has been recived on the Greenhouse Gas Reduction Strategy. The Applicant is open to engagement on these matters with ECC.	ECC would refer to commentary made in response to the 2024 statutory consultation and would welcome more direct responses to the matters raised within this response including site waste management, materiality, construction traffic management and designing for resilience. ECC would note there has been limited engagement with the Applicant on this topic to date but welcomes the clarifications offered here. ECC would wish for this matter to remain under discussion to continue engagement on these matters	Under Discussion
3.15.2	Removal of Obsolete Pylons	The Applicant welcomes ECC's support for the removal of existing lines and acknowledges the Council's encouragement to explore further opportunities to reduce cumulative visual impact of energy infrastructure. 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**	ECC welcomes the proposal to remove a number of 132kV pylon lines operated by UK Power Networks and would encourage National Grid to continue to explore opportunities for N2T to facilitate the removal of further 132kV pylon lines operated by UK Power Networks, to reduce the cumulative visual impact of energy infrastructure, and compensate for the additional LSE to	Under Discussion

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ID	Matter	National Grid's Position	Essex County Council's Position	Status
		Submissions to Issue Specific Hearing 2 [REP4-302] and most recently set out in the **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. 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.	landscape and amenity of the proposed new 400kV power lines The Applicant must demonstrate a commitment to reducing cumulative visual impacts of energy infrastructure, possibly through agreed landscape compensation measures before ECC is able to agree to this point in the SoCG	
3.15.5	Airfields	For The Applicant's position on Airfields, please refer to Section 3.17 'Safety and Security – Airfields in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	ECC seeks to ensure the continued and safe use of all airfields in Essex and would welcome the Applicant's confirmation of this ahead of agreeing this matter.	Under Discussion

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Appendix A.
Draft DCO wording

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Appendix A
Draft DCO wording

A.1.1 Please note that the following table captures matters regarding the draft DCO between the Applicant and Essex County Council. In addition, Basildon Borough Council, Tendring District Council and Colchester City Council have deferred their position on the draft DCO to ECC.

A.1.2 This table contains the views of the Applicant and ECC 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.

A.1.3 The Applicant and ECC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis many matters are retained as Under Discussion.

A.1.4 The parties recognise that work and engagement surrounding the proposed DESNZ unit for the purposes of discharging requirements under the 3.1 Draft DCO is ongoing through written submissions and following discussions at the DCO Issue Specific Hearing (ISH3). On the basis that this work and engagement is ongoing, the parties do not repeat those issues in this SoCG.

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

ID	Matter	National Grid's Position	Essex County Council's Position	Status
1	DCO Wording – Highways	The Applicant shared draft protective provisions with the highways authorities in July 2025 and sought comments on this draft. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the highways authorities. The Applicant has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to	ECC have confirmed their desire to enter into a Framework Highways Agreement or similar side agreement with the Applicant both verbally and in writing when responding to informal comments on the Protected Provisions. ECC welcomes the Applicants acceptance in principle of this approach pending review of a drafted agreement . ECC would welcome further engagement on this point to provide a level of surety for ECC ahead of the close of the examination and will be providing our comments on the latest draft	Under Discussio

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		the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicant's understanding that the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments) to all the highways authorities and we await comments.	of the FHA being discussed between Thurrock Council and the Applicant. This is important as ECC are not satisfied with the level of detail included within the protective provisions. . As the LHA, ECC would expect (and indeed the public and County Council members would expect) a level of oversight and management of the local highway network. ECC believe the Framework Highways Agreement has worked well on Bramford to Twinstead, providing sufficient oversight, and collaboration between the local highway authority and the developer.	
2	DCO Wording - Terminology	The use of "business days" rather than "calendar days" across the draft Development Consent Order is consistent with made development consent orders but the Applicant has considered the point and made appropriate amendments in **3.1 Draft DCO [REP5-060]** submitted at Deadline 3. ith the exception of Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders, the Applicant updated the **3.1 Draft DCO [REP5-060]** to consistently use 'business day' timescales, to remove reference to 'discharging authority' and to update the definition of 'relevant authority'. The Applicant notes the Council's comments on the consistency of terminology and timings in relation to the Permit Scheme and TROs and is considering these points.	Part 1 Preliminary Article 2 – Interpretation **"Business days"**: ECC welcomes the change to "business days." The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it. It is further queried whether the Environmental Permitting (England and Wales) Regulations 2016 and the Energy Act 2004 should also be mentioned in this section. They are relevant to the dDCO "Pre-commencement operations". The Applicant's response to this is noted. **"Pre-commencement operations":**	Not Agreed

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		The Environmental Permitting (England and Wales) Regulations 2016 is already included in Article 2 (Interpretation) as "the 2016 Regulations". The Energy Act 2004 is not referred to in the draft Development Consent Order and therefore does not need to be included in this article. The operations comprised in the definition of pre-commencement operations are either de minimis or have minimal potential for adverse impacts, and by virtue of Requirement 4 of the Order, must be carried out in accordance with the outline management plans. Indeed, they may, in some cases, need to be carried out in order to comply with pre-commencement requirements (for example, to inform assessments and proposals required to be submitted for approval) or to implement environmental mitigation or other measures required pursuant to European Protected Species licences. As noted in **3.2 Explanatory Memorandum [Revision G],** the additional items contained in the definition of 'pre-commencement operations' beyond those in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are: • Listed building surveys – these have been included at the request of Essex County Council; • Protection works comprising utilities protection works or fencing and protection	ECC welcomes the inclusion of pre-commencement surveys of listed buildings in the list of pre commencement operations, as they have the potential to be impacted by vibration once the development commences. ECC maintains its concerns with the remainder of the definition of pre-commencement operations in respect of works 'excluded from the commencement of development' and associated with the establishment of construction compounds. These operations are extensive and include temporary laydown areas and compounds and the creation of bell mouths all of which could necessitate the potential removal of trees and hedgerows in advance of any Requirement for a Vegetation Retention and Removal Plan being discharged. This is also of specific concern in respect of historic buildings where it is noted that specified pre-commencement operations could proceed without triggering necessary mitigation likely to be set out in the Requirements. While the submitted ES assumes that the excluded works and operations would be unlikely to have any significant environmental effects, ECC is of the opinion the effects of some of these works could have major impacts locally that need mitigating, or which could cumulatively give rise to significant effects needing mitigation.	

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		slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary laydown areas in addition to construction compounds. National Grid does not consider its inclusion to be materially beyond the scope already set out. • Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put the Applicant in a favourable position to deliver the Project by the target date. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The pre-commencement operations have been assessed in the Environmental Statement and	As a result, these works have the potential to be so significant as to give rise to materially new/different environmental effects which ought properly to be subject to further checks before being allowed to proceed. In light of this, ideally many operations (such as the establishment of construction compounds), should be excluded from the definition of pre-commencement operations. If this is not acceptable, a compromise could be the addition of a tailpiece: 'those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority' . This matter does not appeared to be agreed with the applicant. ECC notes the Applicant's responses in **[REP 3-074]** to the ExA's questions at DCO 1.A8 and 1.A9. The Applicant has not engaged with ECC's central concern: that even if the operations sit within the broad envelope assessed in the ES, the cumulative effect of allowing extensive compound, laydown, bell-mouth, set-up, plant erection and (now) advertisement display works to proceed before any pre-commencement Requirements are discharged is significant in this rural and heritage-rich context. The list of pre-commencement operations in this dDCO goes materially further than the	

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		are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement. The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the Applicant considers that the exclusion of these works and operations from the definition is appropriate. The Applicant does not consider it necessary or appropriate to include the Council's proposed tailpiece, since any failure to comply with a term of the DCO by the Applicant would be an offence. Furthermore, recently made DCOs do not include such a tailpiece.	Bramford to Twinstead Order on which the Applicant otherwise relies (the Applicant itself accepts this). Reliance on Requirement 4(3) and on the offence of breach is no answer where the relevant planning authority has no opportunity to test whether the works as proposed in fact remain within the assessed envelope. ECC's tailpiece would allow the LPA to flag where, in its view, a particular pre-commencement operation gives rise to a materially new or different environmental effect — which is precisely the situation the DCO ought to control. The 2030 programme cannot displace the planning tests of necessity, precision and enforceability. At a minimum the establishment of construction compounds should be removed from the definition of pre-commencement operations and the materially new/materially different effects safeguard added. It is noted that the Article 2 definition of "pre-commencement operations". It is suggested given the mix of different positions within this matter, this not in full agreement a this stage and therefore should be moved to not agreed.	
3	DCO Wording - Maintain	The Applicant notes the concern raised by Essex, however, it would reiterate that as a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity	"Maintain" The definition of "maintain" includes a wide range of specified operations in relation to the authorised development, providing that as long as such works do not give rise to any	Not Agreed

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		transmission system. As transmission licence holder, the Applicant is the appropriate body with the expertise to discharge its statutory duties in respect of electricity equipment. It is essential that the Applicant is not delayed or prevented from carrying out essential maintenance that enables it to comply with this duty. 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". Furthermore, it would not be appropriate to require the Applicant to approach the relevant planning authority prior to carrying out emergency repair works which also fall within the definition of 'maintain'. The Applicant maintains its position that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant as is common on electricity projects such as this. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. A failure to comply with a term of the DCO would be an offence that can be enforced by the relevant	materially new or materially different environmental effects to those identified in the Environmental Statement, these specified operations can take place without further consent. To provide clarity and avoid any dispute, the DCO should incorporate a mechanism for assessing and determining whether such maintenance works give rise to materially new/different environmental effects. As a result, the definition of 'maintain' be amended to include "provided such works do not in the opinion of the local planning authority give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of "maintain" must be construed accordingly." ECC notes the Applicant's responses in **[REP 3-074]** at DCO 1.A6. The transmission licence duty is a duty to maintain the network. It does not provide any planning control over the form, scale or environmental effects of maintenance works. It is therefore no answer to ECC's concern, and on the Applicant's logic no grid DCO would ever need to safeguard against the environmental effects of maintenance, which cannot be correct. Self-policing through the offence of breach is not a substitute for an enforceable mechanism allowing the LPA to identify, before works are carried out, whether a particular operation falls within the envelope assessed in the ES. ECC's wording would only engage where	

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		planning authority under Part 8 of the Planning Act 2008. As noted above, the Applicant's current approach to maintenance has precedent in a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and the Applicant does not consider it necessary or appropriate to depart from such precedent in this case.	there is a materially new or different effect, i.e. exactly the case that has not been assessed and where LPA control is most needed. ECC's suggested additional wording in **REP1-161** §5.2.11 to give control to the relevant local planning authority has not been added, nor has Article 4 been amended to incorporate any mechanism for addressing materially new or different environmental effects from those assessed in the ES. The Applicant's statutory duty to maintain a safe and efficient transmission network is obviously no answer to this as it would be a reason not to include any safeguards in the DCO. Revision C update: Article 4 (Maintenance of authorised development) has been amended in Revision C (Ref 5 of the Schedule of Changes), but only to give UKOP authority to maintain the new Work No. 17A (UKOP protective works), rather than to qualify the meaning of "maintain" as ECC has sought. Article 2 has not been amended in Revision C in any way relevant to ECC's point. ECC's substantive concern therefore remains.	
4	DCO Wording – Relevant Planning Authority	Where local government reorganisation results in more than one successor authority across a current given area — as may well occur across Essex — the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning	In **REP 3-078**, ECC provided its views in response to GEN 1.5 and DCO 1.S5, identifying that a general addition of "any successor **or successors** in function" would give the requisite clarity, because that would address situations where the functions were split across more than one successor. In light	Under Discussion

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		authority" is already optimally structured from a statutory drafting perspective to address the scenario Essex describes. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case. The proposed addition of "or successors" (plural) is unnecessary: the reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should	of the emerging detail around Local Government Reform, ECC considers that this matter should remain under discussion.	

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		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.		
5	DCO Wording – Outline Management Plans	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision D]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]** are provided as appendices of **7.2 Outline Code of Construction Practice [Revision G]**. The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP); therefore, a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO [REP5-060].** The term "Noise and Vibration Management Plan" is not used in the draft Development Consent Order, which is why it does not have a separate definition, however, the outline management plan is, as the Council has recognised, an appendix to the Code of Construction Practice and hence is controlled by	Omission of outline management plans The dDCO omits reference to outline management plans which were included in the B2T DCO, namely: an Outline Construction Environmental Management Plan. It also omits reference to an outline Noise and Vibration Management Plan (APP-306), and an outline Dust Management Plan (APP-304), both of which are envisaged in the Applicant's Environmental Statement (as appendices to the Code of Construction Practice, but worthy of separate definition in ECC's view, as these are seen as being absolutely necessary to protect enjoyed residential amenity). ECC notes the Applicant's responses in **[REP-074]** to DCO 1.A4 and 1.G3. The Bramford to Twinstead DCO, relied on by the Applicant as comparable precedent throughout its responses, requires a CEMP. The Applicant has not explained why a project of this much greater scale, route length and host authority footprint is said to need different (and less) rather than more control.	Not Agreed

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		Requirement 4 of Schedule 3 to the draft Development Consent Order. As per the Noise and Vibration Management Plan, without express use of the named management plans, there is no purpose in providing definitions.	Requiring users of the dDCO to chase through the Code of Construction Practice and its eight appendices to identify the environmental controls on construction is the opposite of the precision and clarity expected of DCO drafting. A CEMP, NVMP and Dust Plan would each be readily definable in Article 2 and securable in Requirement 4. The Applicant's reliance on the statutory nuisance defence in Article 48 strengthens, not weakens, the case for a separately secured Noise and Vibration Management Plan: where the Article 48 defence is engaged, the LPA's primary control on noise impacts is the management plan regime, and that control should be unambiguous on the face of the DCO. The Applicant relies on the reference in Schedule 3 Requirement 4 to the Code of Construction Practice, to which various documents are appended that it states include all the information typically found in a CEMP [**REP2-030** pg 151]. ECC reiterates it is not clear that the proposed Code of Construction Practice (even with daughter documents) will provide the same sorts of protections as a CEMP. In order to avoid a chase through documents to identify the environmental controls on construction, which are key to the acceptability of the project, a CEMP should be required and secured in Requirement 4 (the	

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			B2T DCO requires such a plan.). The other plans could easily be referred to explicitly. The need for a separate Noise and Vibration Management Plan is also justified by the extent of the Article 48 defence. It is noted that: Schedule 3 Requirement 4 has been amended in Revision C (Ref 33 of the Schedule of Changes) to add consultation with the relevant highway authority on the construction traffic management plan, and to make the requirement to comply with approved plans apply to all stages of the authorised development. However, no CEMP, Noise and Vibration Management Plan or Dust Plan has been added to Article 2 or Requirement 4. ECC's substantive point therefore remains. Given this matter remains unresolved, it is suggested that this matter could be moved to not agreed.	
6	DCO Wording - Interpretation	This term is already defined in Article 2 (Interpretation) of the draft Development Consent Order in the same way as it is defined in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	"Provisional Advance Authorisation" A definition of "provisional advance authorisation" (as per Reg 2 Traffic Management Permit Scheme Regs 2007) should be included in the dDCO to ensure consistency with other DCO, including the Bramford to Twinstead project.	Agreed.
7	DCO Wording – Development Consent etc.	In relation to the comment on Article 3(1), Article 3(8) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the **2.3**	Part 2 Principal Powers Article 3. Development consent etc. granted by the Order	Not Agreed

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	granted by the Order	**Works Plans (Section A [Revision B], Section B [REP6-014, REP6-015], Section C[Revision C], Section D [Revision B], Section E [Revision B], Section F [REP6-016], Section G [REP5-021], Section H [REP6-018]),** subject to article 5 (limits of deviation) and to the Requirements. The Applicant does not consider any further clarification is required. Paragraph (7) specifies that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent that they are required by or incidental to the carrying out of the authorised development, as permitted by section 120(3) of the Act. There is precedent for this in the North Killingholme (Generating Station) Order 2014. Although this provision was removed from the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the scope of the power is not inconsistent with the works authorised in Schedule 1 (authorised development) and is clearly stated to apply for the purposes of the authorised development only. These precedents do not include a mechanism for assessing and addressing any materially new or materially different environmental effects and National Grid considers it appropriate to include this provision in this Order, without amendment, taking into consideration the scale and urgency of the Project.	While Article 3(1) confirms that, subject to the provisions of the Order (including the Requirements) National Grid is granted development consent, the extent of the consented development should be clarified by the addition of "to be carried out within the Order limits" (as defined in the dDCO). This is so that the scope and limits of the development consent are clearly set out and reflect the development subject to the examination. Article 3(6) provides for the authorised development to include and permit the alteration, removal, clearance, refurbishment, reconstruction, decommissioning and demolition of any other building or other structure within the Order limits, to the extent that they relate to, are required by or are incidental to the carrying out of the authorised development. As this is not limited to the authorised development described in Schedule 1 (and "authorised development" is defined more broadly than that in Article 2), the dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from the development authorised in Article 3(6). ECC's amendment is precisely the kind of "on the face of it" clarification that prevents the user of the DCO needing to chase through cross-references to satisfy themselves of the	

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			territorial scope of the consent. The Applicant's response confirms the substance is intended (the works must be within the Order limits) but resists making this express in Article 3(1). There is no good reason not to make a clarification that the Applicant accepts as accurate. It is recommended that this matter is moved to not agreed. The Applicant stated in **REP2-023** of 289 that Article 3(7) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the **2.3 Works Plans [APP-017 – APP-024]**, subject to article 5 (limits of deviation) and to the Requirements, so the Applicant does not consider any further clarification is required. The amendment prevents this kind of chase, and follows the drafting of previous DCOs (B2T; Yorkshire Green Energy). The amendment should be made to article 3 to make clear the authorised development is to be carried out within the order limits.	
8	DCO Wording - Maintenance	In the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network. The Applicant refers to its response at Appendix A Item 3 above and does not repeat those comments here.	Article 4 4. Maintenance of authorised development As raised within Part 1 Preliminary, Article 2 – Interpretation, the scope of works permitted to maintain the authorised development is broad. The dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the	Not Agreed

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		The request for an obligation on the Applicant to decommission part of the authorised development should it become obsolete is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. The Applicant refers to its response to DCO 2.S12 in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** which explains that "The Applicant does not consider that the relevant planning authority would be best placed to determine whether transmission equipment or infrastructure has become obsolete. Such determinations require detailed technical and network planning assessments taking account of system resilience, backup functionality, maintenance regimes and future network needs. Infrastructure that is not in active use may still serve an operational, contingency or strategic function. Operational and network planning assessments are intrinsically linked to the undertaker's statutory duties and licence obligations." It goes on to say "The Applicant considers that a specified or fixed period for the removal of infrastructure would be wholly inappropriate. The timing of any decommissioning would depend on the particular circumstances of the asset, including operational, safety, environmental, engineering and network considerations. A fixed timeframe could unnecessarily constrain the undertaker's ability to manage the transmission network	Environmental Statement arising from such works. In addition, under this Article, there should be an 'in principle' obligation on the Undertaker to decommission (part of) the authorised works as and when they become obsolete due to improvements in technology or otherwise. ECC notes the Applicant's response in **REP3-074** at DCO1.A14. The transmission licence duty is again pressed into service as the answer to a discrete planning point that it does not address. The licence duty does not require decommissioning of obsolete works; if anything, it cuts the other way, since obsolete apparatus has no role in maintaining an efficient transmission system but may continue to occupy the land and have ongoing landscape, ecology and amenity effects. Requirement 13 deals with decommissioning of the whole authorised development. ECC's point is different: an Article-level obligation to decommission individual elements that have become obsolete, securing for the LPAs and host communities that redundant infrastructure will not simply be left in situ. This amendment should be made in Article 4 and/or as a strengthened Requirement 13. The Article 2 definition of 'pre-commencement operations' still expressly includes 'set up works associated with the establishment of construction compounds and temporary	

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		efficiently and safely and could lead to unintended adverse consequences." For these reasons, the Applicant does not consider that additional controls within **3.1 Draft DCO [REP5-060]** are either necessary or appropriate.	laydown areas', and while no materially new / materially different environmental effects safeguard has been added, ECC's point remains outstanding therefore it is recommended that this matter is moved to not agreed.	
9	DCO Wording – Limits of Deviation	The term 'lines and situations' is a commonly used and understood term in development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant does not consider that this term needs to be defined. The Applicant has addressed the Council's concerns on limits of deviation relating to sensitive receptors in the Historic Environment section in Chapter 4 of this document and so we do not repeat that here. Where the Applicant identified particularly sensitive receptors, controls on the limits of deviation are included in the 7.2 Code of Construction Practice. The Applicant has provided its justification for a six metre upwards limit of deviation earlier in this document and does not repeat it here. In respect of the downwards limits of deviation, the Applicant considers there to be sufficient controls included in the outline management plans. The proposed drafting mirrors the drafting contained in Article 5 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Article 5. Limits of Deviation (LoD). ECC's position is set out below, but in summary ECC notes the Applicant's response at **[REP 3-074]** D1.A15-17 and accepts there is a difference of view here. They key issue is that the Applicant has not engaged with the detailed information and list of designated heritage assets at LIR §5.3.9 **[REP1-161]**. The Applicant's response asserts that justification is sufficient and repeats the Explanatory Memorandum text that ECC had already explained was inadequate. The point of LoD controls is precisely to give certainty in environmentally sensitive locations. A blanket 6 m vertical LoD across the entirety of the route, with an Article 5(4) discretion to depart even from that, leaves designated heritage assets in particular without the level of certainty they require. Where the Applicant says departure would be exceptional, that should be reflected in the drafting through prior approval rather than left to discretion. ECC's previous submissions have set out why it considers that the LoD potentially have	Not Agreed

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			significant implications for how the development is experienced and in terms of its relationship to a variety of receptors. Firstly, at Article 5(1)(a) the term 'lines or situations' should be defined and added to list of definitions as the language lacks the clarity required given the importance and potential significance of this element of the DCO. The Limits of Deviation (LoD) allow for longitudinal and lateral deviation within the limits shown on the Work Plans, as well as vertical deviation. ECC notes that Article 5(1)(b)(i) would permit a vertical limit of deviation of 6 metres for the majority of the pylons. The Explanatory Memorandum (APP-057) explains that the rationale for the 6m limit is intended to provide a necessary but proportionate degree of flexibility. While noted, ECC is of the opinion this is a considerable extent of deviation, which as proposed, is not suitable for particularly sensitive areas such as nearby residential properties, in or nearby protected landscapes and nearby Grade 1 listed buildings, where the potential impact would potentially be greater than in other areas. The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been	

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			identified by the Applicant at the Operation and Maintenance phase of the project. The properties potentially affected are identified at Paragraph 5.3.9 of **ECC's LIR [REP1-161]** although this is not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation. It is therefore proposed that the limit vertical deviation should be no more than 4 metres, (as per Bramford to Twinstead DCO, which is a more local, and thus more relevant development than the Yorkshire Green Energy Project, to which the Applicant refers in the Explanatory Memorandum). Anything beyond this 4 meters should require prior approval from the relevant planning authority. At Article 5 (1)(d)(ii), the draft Order would also allow underground cables to be moved downwards to such extent as the undertaker considers necessary or convenient. While this may be acceptable in certain locations, other locations may be more sensitive due to ground conditions, water tables, archaeology	

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			or the cumulative effects of other structures being constructed. In certain defined locations (which should be discussed and agreed with the district authorities) therefore; the limit of deviation downwards should be restricted unless otherwise agreed by the local planning authority. This concern also extends to downward deviation permitted under Article 5 (3)(b). The proposed level of deviation within Article 5(3)(a) allows permanent above ground structures, erections and apparatus forming part of the authorised development, including substations, converter stations and cable sealing end compounds to be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans. This is not appropriate in designated sensitive areas, where this provision needs to be reduced. These sensitive areas must be discussed and agreed between the Applicant and all relevant authorities. In this regard, it is suggested for those designated locations, a lower level of deviation is agreed or a process of prior approval with the relevant local planning authority is introduced. In addition, it is assumed that the level of deviation proposed is consistent with the principles of the Rochdale Envelope which involves defining a set of parameters (e.g.,	

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			maximum building height, footprint, etc.) within which a development can vary. In any event, confirmation is requested that the impacts and worst-case scenarios arising from the limits of deviation are fully assessed in the Environment Statement. The Applicant has not engaged with ECC's reasoning and just asserted that the justification is sufficient **(REP2-030** pg 153), while repeating (at pg 144) the same justification given in the Explanatory Memorandum, which ECC explained in the LIR was not sufficient. The Applicant has not engaged at all with the detailed information and list of designated heritage assets at LIR p 5.3.9 (**REP1-161**) therefore is recommended that this matter is moved to not agreed.	
10	DCO Wording – Street Works	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this	Part 3 Streets Article 11. Street Works Article 11(3) would enable envisaged works in the highway to proceed without express consent from the Street Authority if a decision is not provided within 28 days. ECC agrees with the approach, but not with the timescale. The Bramford to Twinstead DCO included a timescale of 35 days which ECC requests for the Norwich to Tilbury DCO. Providing a longer timescale allows the authority to have sufficient time for necessary internal procedures to consider an application and has been achievable when working on Bramford to Twinstead. It also avoids the need to	Not Agreed

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		revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. In developing the Order limits and drafting this provision and its associated Schedule 5, the Applicant has sought to identify all streets within which works would be necessary and has included those within the Order limits. However, to accommodate the situation where other works potentially outwith the Order limits are required, the Article as drafted allows for this. Where that scenario occurs, the Applicant's expectation is that planning permission (and indeed any further ancillary consents) will be required where works to be undertaken within	request repeated extensions of time which ECC has had to seek in respect of Longfield Solar Farm. Even with the longer time period in the Bramford to Twinstead DCO, extensions of time have been needed. Further clarity is required on the process for works to take place outside the Order limits as referenced in Article 11 (2). ECC's concern is that the assessment of the works is based on the Order limits and anything beyond that will not have been reviewed as part of the DCO process. **Time periods overall**: Articles 11(3), 14(5), 17(2), 20(9), 49 and 50 all raise the same issue with the decision-making/deemed consent period. ECC notes the Applicant's response in **[REP 3-074]** and reference to the £7 million per day delay figure. This is a programme-wide figure for late energisation; it is not a credible justification for setting decision periods that, if missed, trigger deemed consent. The risk to the programme arising from a 35-day or 42-day decision period is materially less than the risk to environmental outcomes arising from deemed consent on inadequate review. This matter remains unresolved and unacceptable and therefore, ECC recommend it is moved to not agreed	

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		any part of the highway outside of the Order limits comprise development within the meaning of Section 55 of the Town and Country Planning Act 1990. However, it would not be appropriate for the draft Development Consent Order to attempt to address all such eventualities (especially those which are already controlled as a matter of general planning law) and, particularly, to prescribe steps to be taken in respect of operations outside of the Order limits.		
11	DCO Wording – Application of Permit Schemes	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the	Article 12. Application of Permit Schemes ECC operates an established Permit Scheme which applies to all adopted streets. It applies to all works promoters, including the Highway Authority (ECC's own works). It involves the promoter applying for a permit to occupy the highway within a specified timescale for different levels of activity. Activities that require a Temporary Traffic Regulation Order ("TTRO") are defined as "Major Activities". The Permit Scheme requires submission of a Provisional Advance Authorisation (PAA) at least three months in advance of a proposed activity, and a permit ten working days before the activity is due to start. As currently drafted, the DCO references the Permit Scheme and in doing so accepts the timescales associated with it. However, the TTRO (at Article 16(8) does not give the standard timescales expected for Permit Schemes. ECC are not able to agree to shorter timescales as the Authority deals with many requests from	Under Discussion

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		control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. The Applicant is considering ECC's comment regarding the timings within its permit scheme.	promoters and the standard timescales given allow sufficient time to deal with the full workload involved. As already shown through the cumulative impact section there is expected to be an overlap of works in Essex of other NSIPs, Garden Communities and Strategic Sites. These works are aside from the many other smaller scale developments and utility works which will all require Permit Scheme applications. Following ECC's established standard processes rather than trying to set up new processes with tighter deadlines will provide a more streamlined approach and collaborative working. It is therefore requested that the timescales for the TTROs are altered to reflect ECC's standard timescales for the Permit Scheme and that the wording reflects that the Temporary Traffic Regulation Order is part of the Permit Scheme. ECC notes the Applicant's response at [**REP 3-074]** at DCO 1.A21. The Article 12(8) amendment addresses a different concern (avoiding parallel appeals) and not the timing alignment ECC asked for. ECC's point remains that the TTRO and temporary closure provisions, as drafted, do not align with the permit and PAA regimes that the same works will engage in practice. That will create operational and legal friction at the discharge stage. Bare "acknowledgement" of ECC's position is not engagement. The Applicant has	

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			not addressed the substance of ECC's concern. ECC awaits a response from the Applicant's consideration of ECC's comment regarding the timings within its permit scheme and therefore recommends that this matter remains under discussion.	
12	DCO Wording – Temporary closure of streets and public rights of way	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be	Article 16 Temporary closure of streets and public rights of way ECC do not accept the 28-day timescale as noted at Article 16(8) in relation to a street authority failing to respond to an application for consent. This is on the basis that a Temporary Traffic Regulation Order for temporary closure of streets would be required and as already highlighted above (under Article 12) is intrinsic within the Permit Scheme which takes 3 months to process. The Temporary Traffic Regulation Order for public rights of way would also require up to 3 months to process. It has to be acknowledged that any closure of access will be difficult for residents – especially where the access is being used for a site compound which could be situated somewhere else/ or where it is for a vague/open-ended period. It is therefore requested that the length of time for a temporary closure is specified in the dDCO. With reference to Art 16 (6), there have been discussions through the PRoW Management Plan around providing 4m wide routes for	Not Agreed

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		proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. The Applicant acknowledges that closures to streets and public rights of way can be disruptive to regular users. However, ECC will appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary closure. Some temporary closures will be very short, whilst others may need to be slightly longer. **7.3 Outline Construction Traffic Management Plan [Revision F]**, which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out further details on these temporary closures. The wording of Article 16(6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC.	bridleways which may be a betterment to existing in some cases - however, this is because the horses need space to turn due to spooking associated with the construction works. In effect this is mitigation. This clause is potentially at odds with this 4m requirement and as such should be reworded There has been no movement by the Applicant to address ECC's concerns, and the substantive points above remain unresolved. It is therefore recommended this is moved to Not Agreed.	

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13	DCO Wording – Construction alteration and maintenance of streets and other structures	Article 18(1) and (2) each include an "unless otherwise agreed with the street authority" caveat to the maintenance provision for streets constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by Article 27 (Temporary use of land by National Grid) to reinstate the land to the reasonable satisfaction of the owners of the land. The Applicant does not consider it appropriate to have a commitment in its 3.1 Draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. **7.3 Outline Construction Traffic Management Plan [Revision F]** further notes that the Main Works Contractor will liaise with the relevant highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management.	Article 18 Construction alteration and maintenance of streets and other structures The wording of Article 18 does not set out how infrastructure will be maintained by the Applicant where the authority does not wish to adopt it. This will occur in particular with the proposed footway/cycleway provision on Bentley Road which is to remain temporarily in place until the works have been completed, because the infrastructure is only needed whilst the works are taking place due to the high level of HGV activity and the impact on cyclists. ECC require the infrastructure to be maintained by the Applicant until such time as it is removed and the land returned to its previous state so wording in the dDCO should be made clear. The completion of works and maintenance timescale is more complex due to the need for multiple DCOs to use the proposed infrastructure. Further clarity is required on how these matters will be managed, and evidence in the form of a collaboration agreement between the various DCOs benefiting from the proposed mitigation. The infrastructure should be maintained at the same excellent standard as required by the LHA and with continuity between each DCO. The above should be included in the DCO to ensure that the mitigation measures proposed will remain in good order for the duration of their availability to the public.	Not Agreed

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			Shared infrastructure and collaboration provisions are particularly relevant given the close interactions with North Falls, Five Estuaries and Lower Thames Crossing that the Applicant itself has acknowledged at **[REP 3-074]** DCO 1.A18. The dDCO should provide a framework for those interactions, not leave them to ad hoc resolution. Although the commitment to the Developers Forum is welcome, ECC considers further discussions are required on this matter especially as remit and terms of reference are yet to be defined. It therefore remains unresolved and it is suggested it is moved to Not Agreedgiven the comments of the Applicant that they do not consider it necessary to have such commitments in the DCO	
14	DCO Wording – Discharge of Water	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain Under Discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank	Part 4 Supplemental Powers Article 20 Discharge of water 5.5.1 The timings set out within Article 20(9) must be increased to 42 days to give sufficient time for the Lead Local Flood Authority to consider any application for consent under this part of the DCO without having to arrange for an extension to the decision making period. This request reflects the available internal resourcing and the increase in time would also bring the DCO in line with other DCOs, such as Bramford to Twinstead. See further the general point made on time periods in row 8 above.	Not Agreed

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		holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.	There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better and therefore it is recommended that this matter is not agreed.	
15	DCO Wording – Defence to proceedings in respect of statutory nuisance	An Outline Noise and Vibration Management Plan is provided at **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]**. This outline management plan will be progressed as all other outline management plans will be and will be controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order.	5.6 Part 6 Miscellaneous and General Article 48 Defence to proceedings in respect of statutory nuisance (s82 EPA 1990) 5.6.1 Given the extent of this article, ECC suggests that a Noise and Vibration Management Plan should be prepared, as envisaged in the Applicant's Environmental Statement (APP-306). See further above at row 4.	Not Agreed

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			Given the difference of opinion and the importance of this matter, it is suggested that this matter is moved to not agreed.	
16	DCO Wording – Traffic Regulation	Given the scale of the Project, the programme pressures and constraint costs that become payable for each day that the Project's energisation is delayed (all of which are explained in more detail elsewhere in this SOCG), the Applicant cannot accept a 12 week period in Article 49 (traffic regulation).	Article 49 – Traffic Regulation 5.6.2 ECC require the timescales at 49(10) for dealing with the permanent TROs to be 12 weeks to align with the Temporary Traffic Regulation Order process. This is to take account of resource and the cumulative impacts that are discussed at length in this LIR. 5.6.3 At Article 49(10) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and the requirement to consult with external consultees including the Police. It is requested this period be extended to 42 days. See further the general point made on time periods in row 8 above. There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better and therefore it is recommended that this matter is not agreed.	Not Agreed
17	DCO Wording – disapplication of legislation	ECC comments on the disapplication of The Hedgerow Regulations are noted. The Applicant can confirm that the 2.16 Trees and Hedgerows to be Removed and or Managed	The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under	Agreed

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		Plans - Section A-H [REP4-029 – 035 and AS-092] show all hedgerows to be removed, affected managed, potentially affected, as well as those that are unaffected by the Project. Hedgerows that are 'important' under The Hedgerows Regulations 1997 are included on these plans and specifically indicated by a dashed line. Measures for minimising impacts on all native hedgerows through detailed design, not just those that qualify as 'important' under The Hedgerow Regulations 1997, have been detailed within **7.2 Outline Code of Construction Practice (CoCP) [Revision G].** The **7.2 Outline Code of Construction Practice (CoCP) [Revision G]** secured by Schedule 3 Requirement 4 of **3.1 Draft Development Consent Order [REP5-060]** provides a structured process whereby hedgerow removal is only determined following detailed survey, design refinement and plan approval. These measures ensure that decisions are informed by appropriate technical input and subject to formal approval by the Local Planning Authority. It also commits to maintaining a photographic and written record of removal and reinstatement. The Applicant considers it appropriate to seek consent for works to trees within or overhanging the extent of the public highway and not included in the trees and hedgerows to be removed and/or managed plans, in the same way that it would for other works within the public highway under the other streets and highways provisions in **3.1 Draft**	the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC does not agree with the current proposed drafting given the breadth of the disapplication, which would allow removal of otherwise strongly protected hedgerows via a "reasonably believes it to be necessary" trigger, without the consent of the LPA. The corridor within which construction will take place is very wide. The Applicant's Hedgerow Report (APP-161) identified 466 hedgerows as potentially important, and surveyed 79, of which 34 were identified as "important". Hedgerows in this landscape are biodiversity assets of national policy weight, not generic vegetation. Full commentary on this topic was provided in ECC's Deadline 4 response **[REP4-328]**. ECC notes the Applicants comments in response to previous concerns set out in its Deadline 4 submission [REP4-328] It welcomes the more structured approach within the framework of the oCoCP and Requirement 4 of the DCO whereby hedgerow removal is only determined following detailed survey, design refinement and plan approval. These measures ensure that decisions are informed by appropriate technical input and subject to formal approval by the Local Planning Authority. It would further welcome the confirmation that a suitably qualified Arboriculturist or Ecologist is to be involved in this process rather than	

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		Development Consent Order [REP5-060]. The Applicant has sought to identify all trees that may be affected, however, it is essential to provide a precautionary mechanism for consent where unforeseen circumstances arise in which works may interfere with the public highway. Given the controls already set out in Article 50, together with those in the Outline CoCP, the Applicant does not agree that it is necessary or proportionate to amend Article 50 to include a more general consent provision. The degree of consent required in Article 50 is well precedented in other DCOs.	just the reference to 'appropriate technical input' but is satisfied regarding the control now in place is consistent with the Government's "Planning Act 2008: Content of a Development Consent Order" guidance to enable it to suggest this is moved to Agreed	
18	DCO Wording – Felling or Lopping	In practice, the term 'near' is intended to relate to, for example, roots that cross beneath the Order limits or canopies that cross over the Order limits and to which the inclusion in the draft Development Consent Order of an arbitrary distance would be impractical and potentially cause significant delays to the construction of the authorised development. A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. The article does not authorise the Applicant to do anything that is not necessary.	Article 50 – Felling or Lopping 5.6.4 ECC recognised that this Article allows for wide powers to do the tree work which the undertaker reasonably believes to be necessary and this consequently gives the Applicant powers to lop prune, cut, trim, coppice, pollard, reduce in height or width any tree shrub, shrubbery, hedgerow or important hedge under or within the overhanging or near part of the authorised development if it reasonably believes it necessary to do so to prevent obstruction/interference with construction, operation or maintenance of authorised development or any apparatus or from constituting a danger to persons constructing maintaining or operating the authorised development. 5.6.5 While a caveat about not causing unnecessary damage to trees / vegetation is	Not Agreed

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		The Applicant has already commented on the 28 day decision period elsewhere in this SOCG and so does not repeat its justification here. Given affected vegetation and how it is affected is clearly shown on **2.16 Trees and Hedgerows to be Removed and/or Managed Plans [REP4-029 to REP4-036]** (i.e. "affected managed" or "potentially affected", it is unclear why a definition of "affected vegetation" is required.	included as is the requirement for consent where works involving trees / vegetation overhanging the highway, ECC maintains a concern that the use of the term 'near' is too ambiguous. This will lead to uncertainty and the potential for more works to be undertaken than absolutely necessary. As such, ECC consider that 'near' should either be removed, or defined as a specific value e.g. 2m, with works only occurring with some prior notice to the relevant LPA. 5.6.6 An open-ended option for vegetation to be removed without the impact of this being appraised is not supported as the impacts on protected hedgerows requires proper assessment. 5.6.7 It is also noted that the areas marked 'affected vegetation' would need careful review once available and it assumed that any additional works would be within the parameters of the approved OLEMP. 5.6.8 At Article 50(5) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and it is requested this period be extended to 42 days to allow for the appropriate consultation to take place with and to avoid the need to request extensions of time which has been the experience of the Authority when dealing with the discharge of Requirements under this Article on other NSIP schemes.	

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			5.6.9 It is also considered the term 'affected vegetation' should be defined. 5.6.10 There is concern that as drafted, this section gives extensive powers and unless further defined in the Trees / Hedgerows to be Removed / Management Plans (i.e. to define limits to the extent of pruning of TPO beyond which prior approval would be required), the powers could result in harm to TPO trees with significant visual amenity. This will need to be reviewed once the Trees / Hedgerows to be Removed / Management Plans are submitted. ECC considers that Articles 50 and 51 and any linked plans/definitions need to be amended – this matter is therefore considered not agreed.	
19	DCO Wording – Felling or Lopping / Trees subject to Tree Preservation Orders	The Applicant refers to it response to ECC's comments on Article 50 above. The Applicant does not consider it necessary to include a notice provision and notes that such provisions are not included in other recent development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Article 50 Felling or Lopping / 51 Trees subject to Tree Preservation Order Reinstatement and Compensation 5.6.11 Article 51 permits an undertaker to carry out extensive tree works to TP trees if it reasonably believes it is necessary to do so in connection with the implementation of the DCO and gives deemed consent to do so. Owing to the special importance of trees subject to TPOs, a definition of "near" is required for the avoidance of doubt (ideally defined as a specific value e.g. 2m for example, or as otherwise agreed). 5.6.12 Additional wording should also be included in this Article to the effect that advance notice of proposed works must be	Not Agreed

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			given to the Local Planning Authority and opportunity given for the planning authority to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work). ECC considers that Articles 50 and 51 and any linked plans/definitions need to be amended – this matter is therefore considered not agreed.	
20	DCO Wording - Safeguarding	The Applicant does not follow why more than two business days is required in this instance. The Council's proposed drafting prevents them from determining the application for a further three business days than is proposed by the Applicant. Should the Examining Authority consider it appropriate, the Applicant would be content to extend the period in article 56(3)(b) from two business days to five business days. The Applicant acknowledges ECC's position on Article 56(5). The term "business days" is used elsewhere in the draft Development Consent Order.	Article 56 Safeguarding 5.6.13 Article 56(3)(b) should be amended as follows: "they may not determine the application before the end of the period of 21 days, beginning five business days after the relevant planning authority has sent the notice to the undertaker by first class post or by such other means of service as may be agreed with the relevant planning authority, which will be deemed to be the date on which the undertaker receives the notice or copy of the application." This is to ensure that adequate time is offered for all parties engaged in the process. 5.6.14 ECC notes and accepts the following amend made to Article 56(5) "In determining an application for planning permission a relevant planning authority must take into account any representations received in accordance with this article". ECC notes the Applicant's response in **[REP 3-074]** at DCO 1.A40. The Applicant has addressed only the period that follows the	Not Agreed

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			trigger, not the trigger point itself. Two business days from notice is too short – five business days is a modest extension and does not affect the overall envelope materially. ECC is concerned that the Applicant is only willing to make this amend if the ExA requires it. Additionally, ECC considers the extended time period is insufficient in response to the practical experience of the Council. This matter must therefore move to Not Agreed.	
21	DCO Wording – Service of Notices	The Applicant notes ECC's position.	Article 61 Service of Notices 5.6.16 It is acknowledged direct email contacts/ methods of service between the Essex Authorities and Undertaker to promote efficient communication is required with a preference for email communication.	Agreed
22	DCO Wording – protective provisions	ECC comments on the protective provisions are noted, and National Grid will continue to engage with ECC on this matter.	ECC will continue to engage with the Applicant on this matter. .	Under Discussion
23	DCO Wording – Protective Provisions (Drainage and Flood)	The Applicant is liaising with ECC as lead local flood authority and awaits comments on the latest draft protective provisions shared on 3 March 2026.	Schedule 16 Protective Provisions Part 3 for the protection of drainage and flood authorities Approval of Plans Paragraph 3(1)(a) – The Lead Local Flood Authority recommends the inclusion of approval under Section 23 of the Land Drainage Act 199. Furthermore, with reference to Paragraph 3(6), where the drainage strategy plan	Not Agreed

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			changes the LLFA should be consulted regarding the changes at the earliest opportunity to ensure there is adequate time to consider any request. A minimum of 20 business days is suggested. (Para 5.9.1-5.9.2) ECC considers that the currently proposed drafting of the protective provisions is unacceptable. This is due to the position in legislation that the ousting of control via section 23 of the Land Drainage Act 1991 is only possible if the drainage authority consents. There are also concerns about the time periods for decision, which the applicant is proposing a 28 day period, whereas under the Land Drainage Act there is effectively a 62 day period for approvals. ECC continues to oppose to the disapplication of the Land Drainage Act unless there is modification of the current drafting of the protective provisions. ECC would welcome further engagement from the applicant on this point but in light of the fact there is no agreement, it is recommended this is moved to Not Agreed	
24	DCO Wording – Protective Provisions (Highways)	It is the Applicant's understanding that as noted the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the highways authorities provided it can be concluded before the end of	Part 4 for the protection of the highway authorities As mentioned previously, ECC's preference is to enter into a Framework Highways Agreement or similar side agreement with the Applicant to deal with the design approvals	Under Discussion

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		the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments which are summarised in ECC's Local Impact Report) to all the Highways Authorities and we await comments. In the absence of a Framework Agreement, the Applicant is considering the comments raised by the Council.	rather than the use of Protected Provisions. This is on the basis that ECC expect (as indeed the public would expect) a level of oversight and control of the local highway network. However, we have provided comments on the text in the dDCO should the Protected Provisions be the only route available. The "Approval period" is defined as 14 days for Minor Works and 28 days for Major Works. ECC refer to the discussion points around this at Schedule 11 where ECC have requested that the formal decision period is extended to 35 days to be in line with the Bramford to Twinstead DCO. A description of the types of work that constitutes "early works" is needed as is shown for the pre-commencement definition. The agreed wording from the recently consented Five Estuaries DCO (Protected Provisions, Article 131) should be included for the definition of "road safety audits": "(1) The undertaker must procure that an appropriately qualified RSA team (as defined in HPN039 or DMRB Volume 5 Section 2 Part 2 (GG 119) as advised by the local highway authority (acting reasonably) or any replacement or modification of that standard) undertakes road safety audit in accordance with the standard as set out in HPN039 or DMRB standard GG 119 as advised by the local highway authority (acting reasonably) for works which involve creation, alteration, expansion or other modifications of the local highway but not for works which consist only	

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

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

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			and in writing when responding to informal comments on the Protected Provisions. ECC would welcome further engagement on this point to provide a level of surety for ECC ahead of the close of the examination and ECC will be providing comments on the latest draft of the FHA being discussed between Thurrock Council and the Applicant. This is important as ECC are not satisfied with the level of detail included within the protective provisions. This matter can therefore remain under discussion.	
25	DCO Wording – Certified Documents	The documents to be certified will be available on the Planning Inspectorate's website.	5.10 Schedule 19 Certified Documents 5.10.1 The dDCO should secure that certified documents remain readily available to local authorities engaged in the discharge of requirement, in the interests of clarity, efficiency of process and transparency. This matter should remain under discussion as ECC considers it is critical that documents required for the consideration of requirements are available at point of need – especially when project construction span a number of years.	Under Discussion

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4. Confirmation of Agreement

Signed for and on behalf of National Grid:

[redacted] [redacted]

Date:

21/07/2026

Signed for and on behalf of Essex County Council:

[redacted] [redacted]

Date:

21/07/2026

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Abbreviations

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

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