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Norwich to Tilbury

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nationalgrid

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1. Introduction

- 1.1.1 National Grid prepared and submitted 5.7 Policy Compliance Document [APP-086] as part of its application for development consent. The Policy Compliance Document was prepared in compliance with Regulation 5(2)(q) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 which require ‘any other documents considered necessary to support the application’. The Policy Compliance Document provided an assessment of the Project’s strategic alignment and conformity with the following policy documents:
- Overarching National Policy Statement for Energy (EN-1) (2024) (Department for Energy Security and Net Zero)
 - National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024) (Department for Energy Security and Net Zero)
 - National Policy Statement for Renewable Energy Infrastructure (EN-3) (2024) (Department for Energy Security and Net Zero).
- 1.1.2 The Policy Compliance Document set out how the Project is in general accordance with the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024), as well as relevant adopted and emerging local plan and neighbourhood plan policies which were in place on or before 1 April 2025.
- 1.1.3 Since submission of the application, a number of relevant national and local planning policy documents have been subject to consultation, or adopted. In the Rule 6 Letter [PD-009], the Examining Authority requested National Grid to provide:
- A National Policy Statement Tracker, which sets out the changes/modifications to any relevant updated National Policy Statement (NPS)
 - A tracker related to any other new government policy intentions for energy and critical energy infrastructure that are not addressed within the NPSs
 - Updates with regard to the draft NPPF (published December 2025).
- 1.1.4 In addition, the Examining Authority also requested a tracker on any National Development Management Policies (NDMP) and development plan documents published for consultation or adopted as National Grid considers them to be relevant to the Project. The Examining Authority requested the production of a Policy Compliance Tracker for Deadline 1 [REP1-133], Deadline 4 [REP4-294] and Deadline 7 (this submission).
- 1.1.5 The Policy Compliance Trackers have been produced as separate addendums (rather than updates) to the Policy Compliance Document [APP-086]. As such each Policy Compliance Tracker needs to be read separately.
- 1.1.6 This iteration of the Policy Compliance Tracker for Deadline 7 includes an assessment of the Project against emerging and adopted policies issued between 18 May 2026 and 13 July 2026 and includes an assessment of the Project against:
- Electricity Transmission Design Principles (ETDP) published by NESO on 30 June 2026

- Chelmsford City Council Local Plan Review (Pre-submission Regulation 19) (Draft Plan February 2025) submitted for Examination on 5 June 2026
- Swainsthorpe Neighbourhood Plan draft published in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, 2012 (as amended). The consultation period runs between 10 June and 22 July 2026.

- 1.1.7 The Government consulted on proposed changes to the National Planning Policy Framework (NPPF) and proposed reforms to the planning system between 16 December 2025 and 10 March 2026. An assessment of the Project was reported at the consultation draft at Deadline 1 [REP1-133] in anticipation of an updated NPPF being published in summer 2026. The Applicant notes that a Westminster Hall debate took place on 16 July 2026 during which Matthew Pennycook, Minister for Housing and Planning set out that following the Prime Ministers announcement to resign on 22 June and associated constraints on Government Business including a prohibition on new policy it was not possible to issue the revised NPPF ahead of the Parliamentary recess. The intention remains to publish 'in due course'. It is anticipated that the publication of the updated NPPF will not be made in advance of the close of the Examination.
- 1.1.8 An assessment of how the Project has had regard to the ETDP, Chelmsford City Council Local Plan and Swainsthorpe Neighbourhood Plan policies is set out below.

1.2 Electricity Transmission Design Principles

- 1.2.1 Planning, consenting, and building new transmission infrastructure projects can take a significant amount of time. Accordingly, it is widely recognised within the UK government and the electricity transmission industry of Great Britain that, to achieve the UK's commitment to reach net zero by 2050 and enable the government's economic growth targets, the delivery of electricity transmission infrastructure needs to be significantly accelerated.
- 1.2.2 In 2023 the Electricity Networks Commissioner proposed recommendations on how to accelerate the deployment of strategic electricity transmission infrastructure in Great Britain. The UK government adopted these recommendations which now form the basis of the Transmission Acceleration Action Plan (TAAP)⁷. The TAAP sets out 43 recommendations, which collectively seek to reduce build time of electricity transmission network infrastructure from 14 to 7 years. Recommendation 'RD1' of the UK government's TAAP states that: 'Electricity Transmission Design Principles (ETDP) should be created to provide greater clarity on the type of asset to be used in different environments.' The National Energy System Operator (NESO) led the development of the ETDP.
- 1.2.3 Following a consultation on a draft ETDP in October 2025, NESO published the ETDP on 30 June 2026. The Design Principles aim to provide clear, non-project specific transmission design guidance. The Design Principles draw together design considerations from key government policy, industry guidance and professional experience, referencing, clarifying and updating these to ensure they are fit for purpose. In particular, this first publication has been strongly guided by:
- The legislative framework for transmission developers, in particular their Transmission Licence conditions and NPS EN-5, as well as the National Planning Framework 4 in Scotland.
 - The Holford and Horlock Rules, that form part of current NPS EN-5 Policy.

- Environmental policies and frameworks including statutory requirements such as Biodiversity Net Gain, Environmental Impact Assessment (EIA) regulations, routeing and visual impact guidance, the application of the mitigation hierarchy, as well as other obligations covering habitats protection and climate resilience.
- Practical professional experience of transmission design provided by NESO and the three TOs.
- Respondents to the October 2025 consultation – transmission developers, national and local government, regulatory representatives, statutory nature and conservation bodies, campaign groups and individual members of the public amongst them.

- 1.2.4 In November 2025 new energy National Policy Statements (NPSs) EN-1, EN-3 and EN-5 were laid before Parliament, and these came into force on 6 January 2026. Although the Norwich to Tilbury application for development consent will be determined against the previous NPSs the new documents are referenced here as they are relevant in the decision-making process. EN-5 (2026) states at paragraph 2.9.20: ‘NESO will consult on and publish Electricity Transmission Design Principles (ETDP), which will apply to onshore and offshore electricity transmission infrastructure. The ETDP will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design. Once the ETDP is published, developers should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules.’ This paragraph is subject to footnote 24 which states: ‘Projects will seek to apply the ETDP to the strategic planning stage and project development stage. The strategic planning stage is typically part of the Centralised Strategic Network Plan (CSNP), Connections, or Business Plan process and defines the high-level characteristics of future transmission infrastructure. It sets broad parameters such as technology type, connection points to the existing network, and capacity requirements. The project development stage involves translating strategic intent into design, routeing, and consenting activities. It prepares the project for planning and regulatory approvals ahead of construction. **Any project that has been through the strategic planning stage before the ETDP are published will not be expected to have had regard to them.**’ (Applicant’s emphasis).
- 1.2.5 This position is maintained within the published ETDP which states at page 10: ‘At the time of publication, some projects will therefore already be well advanced or undergoing consultation, having entered development before the Principles were finalised. It is not intended that the Principles are applied retrospectively. Projects that have completed the strategic planning stage prior to publication would not be expected to have had regard to them, and the Principles are not intended to reopen established design decisions.’
- 1.2.6 It is the Applicant’s clear view that the ETDP does not apply to the Norwich to Tilbury Project as the project went through the strategic planning stage long before the publication of those design principles. They are not expected to apply to projects currently in development, in particular those already in examination.

1.3 Signposting of policy wording of any relevant adopted or emerging local plan policy (Chelmsford City Council)

Table 1.1 Signposting of policy wording of relevant local plan policy

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Chelmsford City Council Local Plan Review (Pre-submission Regulation 19) (Draft Plan February 2025)		
Strategic Policy S4 – Conserving and Enhancing The Natural Environment	The Council is committed to the conservation and enhancement of the natural environment through the protection of designated sites and species, whilst planning positively for biodiversity networks and minimising pollution. All projects should have regard to reducing the impacts of climate change and respond to the ecological emergency, delivering multiple benefits in terms of but not exclusive <u>limited to</u> habitats, carbon storage and Natural Flood Management. The Council will plan for a well-connected multifunctional network of green and blue infrastructure which protects, enhances and restores ecosystems and allows nature recovery across the Council's area. The garden community developments will be required to deliver 20% Biodiversity Net Gain, <u>subject to site constraints, other</u> Other <u>qualifying new development, unless exempt,</u> will be required to deliver a minimum 10% Biodiversity Net Gain. The needs and potential of <u>for</u> biodiversity will be considered together with those of natural, historic and farming landscapes, the promotion of health and wellbeing, sustainable travel, water management including water resources, and climate change adaptation. The Council will ensure that new development <u>maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy and the Council's Green Infrastructure Strategic Plan or future replacements.</u> does not contribute to water pollution and, where possible, enhances water quality, and demonstrates the	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off site mitigation/enhancement. This is reported in 7.1 Biodiversity Net Gain Report [APP-

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	advancement of biodiversity and amenity interests through the provision of a range of greenspaces. Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary. Developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters. The Council will ensure that, where appropriate, new development seeks to improve water-related biodiversity taking account of Water Framework Directive objectives and River Basin Management Plan actions. The Council will ensure that new development maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements. The Council will seek to minimise the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) to major new development. Contributions from qualifying residential developments within the Zones of Influence, <u>and any other mitigation measures,</u> -as defined in the adopted <u>or subsequent revisions of the</u> Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS. <u>Developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters.</u>	299](Revision B). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. <u>Indicative landscape proposals for each of the Environmental Areas are included in Appendix D of the Outline Landscape and Ecological Management Plan (Revision E). At detailed design stage the species mixes within the final landscape designs for the Environmental Areas will be guided by the local context of each mitigation area, with reference to information from the Local Nature Recovery Strategy (LNRS) where available and feasible.</u> <u>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 LNRS as far as practicable.</u> In relation to water quality, 6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-224](Revision B) details the likely significant effects of the Project on the water environment with respect to surface water discharges and water pollution. The baseline of the water environment is characterised in this chapter. The assessment has been informed by 7.10 Water Framework Directive Assessment [APP-332]. The assessment presents the existing consented discharges to surface water that have been obtained from the Environment Agency (January 2024). During construction, temporary

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		watercourse crossings and associated activities may lead to changes in flow regimes, hydromorphology, and pollution risks, such as runoff and drilling fluid releases. Standard practice measures outlined in 7.2 Outline Code of Construction Practice [REP3-025](Revision G) mitigate these risks, reducing impacts on water quality and hydromorphology to negligible or minor adverse levels, which are not significant. For trenchless crossings, measures like drilling fluid breakout management plans minimise disturbance to sensitive watercourses, such as the River Stour. Overall, potential impacts on designated nature conservation sites and groundwater are assessed as negligible and not significant, with safeguards ensuring minimal environmental disruption. Discussions would be held with the Environment Agency in relation to any required consents and permits necessary for the works, in accordance with commitment W01 in 7.2 Outline Code of Construction Practice [REP3-025](Revision G). The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. Water pollution from permanent drainage will be avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality. Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		accordance with 6.20 Scoping Opinion [APP-297]. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] assess the potential residual effects of the Project on agricultural land use within the Order Limits. The potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. In Chelmsford, there are 29,280 hectares of BMV land, (85.5% of agricultural land in the Borough). During construction and operation (including maintenance) there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. 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 Project through

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		engaging with residents 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 regular communication including letters, phone calls and meetings. 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. No sterilising effects on land use within Chelmsford is anticipated as a result of the Project. Unless land has been otherwise identified for mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. No likely significant effects on agricultural operations and viability are anticipated during operation.
Strategic Policy S7 – The spatial strategy	The Spatial Strategy applies the Spatial Principles to focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; new garden communities to the north east and east of Chelmsford; sustainable urban extensions around Chelmsford and South Woodham Ferrers; expansion of existing employment sites; and development around Key Service and Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy set out below:	The Applicant notes the locations identified for future development and growth within Chelmsford. The adopted design approach is set out within 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127](Revision B) which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. This assessment included the consideration of development plan allocation. The Project does not directly interact with any

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy																						
	Settlement Hierarchy	residential allocations identified in the emerging Chelmsford Local Plan.																						
	<table><tr><th>Category</th><th colspan="2">Settlement</th></tr><tr><td>1. City or Town</td><td colspan="2">Chelmsford*, South Woodham Ferrers</td></tr><tr><td rowspan="2">2. Key Service Settlements</td><td>Outside Green Belt</td><td>Within Green Belt</td></tr><tr><td>Bicknacre, Boreham, Broomfield, Danbury and Great Leighs</td><td>Galleywood, Runwell, Stock and Writtle</td></tr><tr><td rowspan="2">3. Service Settlements</td><td>Outside Green Belt</td><td>Within Green Belt</td></tr><tr><td>East Hanningfield, Ford End, Great Waltham, Little Waltham, Rettendon Place and Woodham Ferrers</td><td>Highwood, Margaretting, Ramsden Heath/Downham, Roxwell and West Hanningfield</td></tr><tr><td rowspan="2">4. Small Settlements</td><td>Outside Green Belt</td><td>Within Green Belt</td></tr><tr><td>Chatham Green, Good Easter, Howe Green, Howe Street, Little Baddow, Rettendon Common and Sandon</td><td>Edney Common</td></tr></table>	Category	Settlement		1. City or Town	Chelmsford*, South Woodham Ferrers		2. Key Service Settlements	Outside Green Belt	Within Green Belt	Bicknacre, Boreham, Broomfield, Danbury and Great Leighs	Galleywood, Runwell, Stock and Writtle	3. Service Settlements	Outside Green Belt	Within Green Belt	East Hanningfield, Ford End, Great Waltham, Little Waltham, Rettendon Place and Woodham Ferrers	Highwood, Margaretting, Ramsden Heath/Downham, Roxwell and West Hanningfield	4. Small Settlements	Outside Green Belt	Within Green Belt	Chatham Green, Good Easter, Howe Green, Howe Street, Little Baddow, Rettendon Common and Sandon	Edney Common		
Category	Settlement																							
1. City or Town	Chelmsford*, South Woodham Ferrers																							
2. Key Service Settlements	Outside Green Belt	Within Green Belt																						
	Bicknacre, Boreham, Broomfield, Danbury and Great Leighs	Galleywood, Runwell, Stock and Writtle																						
3. Service Settlements	Outside Green Belt	Within Green Belt																						
	East Hanningfield, Ford End, Great Waltham, Little Waltham, Rettendon Place and Woodham Ferrers	Highwood, Margaretting, Ramsden Heath/Downham, Roxwell and West Hanningfield																						
4. Small Settlements	Outside Green Belt	Within Green Belt																						
	Chatham Green, Good Easter, Howe Green, Howe Street, Little Baddow, Rettendon Common and Sandon	Edney Common																						
	<i>*Chelmsford includes its Urban Area such as Chelmer Village, Great Baddow and Springfield.</i>																							

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
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In addition, at any of the Settlement categories, new growth sites which are in accordance with the Local Plan Spatial Principles and Strategic Policies can be allocated through relevant Neighbourhood Plans.

New development allocations will be focused on the three Growth Areas of Central and Urban Chelmsford, North Chelmsford, and South and East Chelmsford using the distribution set out in the Key Diagram (Figure 14), Policies Map, and the table below:

Spatial Strategy – Development Locations and Allocations

Development allocations to 2041	New Homes	Traveller Pitches	Travelling Show people Plots	Net New Employment Floor space
Growth Area 1 – Central and Urban Chelmsford				
<i>Site/Location</i>				
1	Previously developed sites in Chelmsford Urban Area	3,013 782		4,000 sqm Use Class E(g)(i-ii)
2	West Chelmsford	880	5	
3a	East of Chelmsford - Manor Farm	360		
3b	East of Chelmsford - Land North of Maldon Road			5,000 sqm Office/ Business Park

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy		
	3c East of Chelmsford - Land South of Maldon Road	109		
	3d East of Chelmsford - Land North of Maldon Road	65		
	4 Land North of Galleywood Reservoir	24		
	5 Land surrounding Telephone Exchange, Ongar Road, Writtle	25		
	<u>18 Land North West of Chelmsford (North of Hollow Lane)</u>	<u>100</u>		
	<u>19 Land West of Patching Hall Lane</u>	<u>200</u>		
	Area Total	4,5214 76	5	9,000 sqm
	Growth Area 2 – North Chelmsford			
	Site/Location			

Local Policy Reference	Policy Wording				How the Project has had regard to Local Planning Policy
	6	North East Chelmsford (Chelmsford Garden Community)	5,5 806 9	10	56,946 sqm Office/Business Park
	7a	Great Leighs - Land at Moulsham Hall	750	5	
	7b	Great Leighs - Land East of London Road	250 390		
	7c	Great Leighs - Land North and South of Banters Lane	400 113		
	8	North of Broomfield	512		
	9a	Waltham Road Employment Area			3,500 14,000 sqm B2/B8
	<u>9b</u>	<u>Land to the East of 118 to 124 Plantation Road</u>	<u>60</u>		
	<u>9c</u>	<u>South of Main Road and Dukes Wood Close</u>	<u>22</u>		
	14b	Land south of Ford End Primary School, Ford End	20 75		
	15	Little Boyton Hall Farm Rural Employment Area			6,000 sqm B2/B8

Local Policy Reference	Policy Wording				How the Project has had regard to Local Planning Policy
	Area Total	7,201 <u>7,502</u>	10	5	66,446 <u>76,946</u> sqm
	Growth Area 3 – South and East Chelmsford				
	Site/Location				
	16a East Chelmsford Garden Community (Hammonds Farm)	3,000	20	13	43,000 sqm Business Space
	16b Land adjacent to A12 Junction 18				43,000 <u>46,605</u> sqm Business Space
	10 North of South Woodham Ferrers	1,220		5	1,200 sqm Business Space
	11b Land at Kingsgate, Bicknacre	20 <u>20</u>			
	11c Land west of Barbrook Way, Bicknacre	2 <u>50</u>			
	12 St Giles, Bicknacre	32 <u>50</u>			
	13 Danbury	10 <u>10</u>			
	17a Land North of Abbey Fields, East Hanningfield	11			

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy		
	17b Land east of Highfields Mead, East Hanningfield	<u>2020</u>		
	<u>17c Land South of Rough Hill Complex</u>	<u>115</u>		
	<u>17d Land South and South East of East Hanningfield Village</u>	<u>150</u>		
	<u>17e Land South of Windmill Farm Back Lane</u>	<u>40</u>		
	<u>20 Land to East and North of Rettendon Place</u>	<u>350</u>		
	<u>21a Land North of Old Rectory Lane, Main Road, Woodham Ferrers</u>	<u>15</u>		
	<u>21b Land North of Congregational Church, Main Road, Woodham Ferrers</u>	<u>15</u>		
	Area Total	<u>4,4235</u> <u>357</u>	20	18 <u>90,80587,200</u> sqm
	Total Local Plan Allocations	16,100 <u>17,380</u>	30	28 162,646 <u>176,751</u> sqm

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy			
	Windfall Allowance 2027-2041	2,373			
		218			
	TOTAL	18,473	30	28	162,646
		9,598			176,751 sqm
	There will also be opportunities for Exception Sites providing affordable homes and community-led development in some locations where there are policies of constraint. Windfall sites are further expected to be a reliable source of housing supply during the period of the Local Plan. New employment growth will be delivered as part of mixed used development on appropriate previously developed sites in Chelmsford Urban Area. Strategic employment growth is directed to strategic site allocations at North East Chelmsford (Chelmsford Garden Community), a new garden community to the east of Chelmsford (Hammonds Farm), Land adjacent to A12 Junction 18, East Chelmsford, and as extensions to Little Boyton Hall Farm Rural Employment Area and Waltham Road Employment Area. All development allocations will be located to ensure existing settlements maintain their distinctive character and to avoid coalescence between them. Beyond the main settlements the Council will support diversification of the rural economy and the conservation and enhancement of the natural environment. New development will be delivered in a manner that ensures the timely provision of necessary supporting infrastructure. Strategic Growth Sites will be delivered in accordance with masterplans to be approved by the Council. Where there are large and established mainly institutional uses within the countryside, Special Policy Areas will be used to support their necessary functional and operational requirements. The Special Policy Areas are defined on the Policies Map at Chelmsford City				

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	Racecourse, Broomfield Hospital, Hanningfield Reservoir Treatment Works, RHS Hyde Hall Gardens, Sandford Mill and ARU Writtle.	
Strategic Policy S8 – Delivering Economic Growth	In determining planning applications, the Council will ensure that development on the flexible and market-responsive employment land allocations will enable balanced job and housing growth and allow further diversification of Chelmsford’s economy, in particular nurturing and growing the construction, clean energy, advanced manufacturing and engineering, digi-tech, life sciences, health and care, and professional and support sectors. The Council will encourage links between business and the significant education sector in Chelmsford, in particular the roles of the Anglia Ruskin University as a major economic catalyst for economic growth. The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans. The Council will assess development proposals against the following principles: • Priority will be given to the use of previously developed land in sustainable locations and also focusing new employment at locations well-served by active and sustainable travel modes and existing or planned public transport provision • Existing Employment Areas and Rural Employment Areas identified on the Policies Map will be safeguarded for employment uses, unless it can be demonstrated that there is no reasonable prospect of the allocated employment area being used for that purpose • Support will be given to the sustainable growth and expansion of rural businesses • Support will be given for regional growth sector priorities and clustering of economic activity	The Applicant notes the locations identified for future development and growth within Chelmsford. The adopted design approach is set out within 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127](Revision B) which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. The Applicant is aware of the interaction between the Project and ARU Writtle Special Policy Area.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	- Chelmsford City Centre and sites allocated for employment are the appropriate locations for large new office (E(g)(i)) and research and development (E(g)(ii)) provision - New employment development will be a key component of growth within specific proposed new Strategic Growth Locations particularly the new Garden Communities in North East and East Chelmsford - Improving local work and training opportunities from major development proposals through Employment and Skills Plans.	
Strategic Policy S9 – Infrastructure Requirements	Priorities for infrastructure provision or improvements are also contained within relevant Strategic Policies and Site Allocation policies. New development must be supported by the provision of infrastructure, services and facilities that are identified as necessary to serve its needs. Transport and Highways New development must be supported by active and sustainable means of transport to serve its need including walking, cycling and public transport modes. New highway infrastructure should help to reduce congestion, link new development and provide connections in the strategic road network. These include but are not limited to: - New Beaulieu Park Rail Station - Chelmsford North East Bypass - An additional new Northern Radial Distributor Road in North East Chelmsford Safeguarded land for the expansion of Chelmer Valley and Sandon Park and Ride sites - Additional Park and Ride facilities will be considered in West Chelmsford and North East Chelmsford within the broad locations shown on the Policies Map	During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311](Revision C) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. In relation to flood risk, 6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-224](Revision B) sets out how the Project has sought to minimise impact on flooding. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to its linear

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	• Improvements to the Army and Navy Junction and routes connecting to the junction as part of a sustainable transport package • Improvements to A131 (Essex Regiment Way) and A1016 (Essex Regiment Way) • New foot/cycle bridge across A131 (Essex Regiment Way) • Junction improvements on the A12 and other main roads to reduce congestion • Capacity improvements to the A132 between the Rettendon Turnpike and South Woodham Ferrers, including necessary junction improvements to be brought forward as early as possible in tandem with the delivery of development to mitigate its impact • New and improved active and sustainable travel routes and bridges both within development sites and to provide connections to centres and hubs of activity such as transport nodes, City, Town and Neighbourhood Centres, strategic areas of recreation and employment areas, education and health centres • A new active and sustainable route and bridge over the A12 from East Chelmsford Garden Community to connect close to Sandon Park and Ride • A new multi-modal vehicular bridge over the River Chelmer to connect East Chelmsford Garden Community to Junction 19 of the A12 (Boreham Interchange) • Bus service, bus priority schemes and rapid transit measures • Improvements to inter-urban public transport • Transport links between new neighbourhoods and Chelmsford City Centre and employment areas • Improved road infrastructure aimed at reducing congestion and providing more reliable journey times.	nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. 7.2 Outline Code of Construction Practice [REP3-025](Revision G) describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority using suitable SuDS that are maintained for the Project's lifetime. 7.9 Flood Risk Assessment [APP-331] states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. The Community Facilities section of Policy S9 is not relevant to the Project. With regard to the natural environment, the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	Flood Risk Management New development must be safe from all types of flooding and not make flood risk worse elsewhere. Suitable strategic and site level measures will need to provide appropriate flood risk management. These include but are not limited to: • Strategic flood defence measures on the Rivers Chelmer, Can and Wid to protect Chelmsford City Centre • Local flood mitigation measures within or as part of development sites including the use of SuDS • Provision of new lock and replacement of weir gates at Chelmer Waterside Community Facilities Infrastructure necessary to support new development must provide a range of community infrastructure to ensure that it is served by the essential education, health and community services and facilities. These include but are not limited to: • Early years, primary <u>Primary</u>, and secondary, and post-16 <u>early years education and childcare, including SEND provision</u> education provision • Essential primary, acute and community healthcare provision • Health and wellbeing facilities and measures • Sport, leisure and recreational facilities • Community buildings and space • Provision of serviced moorings along the River Chelmer • Cultural facilities and public art • Police, ambulance, and fire and rescue facilities • Cemetery space and crematorium provision • Municipal waste/recycling facilities.	important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation. This is reported in 7.1 Biodiversity Net Gain Report [APP-299](Revision B). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068](Revision D) reports the assessment of the likely significant cultural heritage effects that could result from the Project. The Applicant has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. 6.11 Environmental

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	Green Infrastructure and Natural Environment Infrastructure necessary to support new development must provide or contribute towards ensuring a range of multifunctional green, blue, and natural infrastructure, nature recovery, net gain in biodiversity and public realm improvements. These include but are not limited to: • Provision of a wide range of open space within development sites to meet amenity, recreational and functional needs • Provision of a multifunctional network of green and blue infrastructure to enhance biodiversity • Provision of areas for nature recovery • Provision of new public realm and enhancements at key centres of activity • Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy • Contributions towards addressing cumulative recreational pressure on SSSIs. Historic Environment Infrastructure necessary to support new development must seek to preserve or enhance the historic environment and mitigate any adverse impacts on nearby heritage assets and their settings. Utilities Infrastructure necessary to support new development must include appropriate utility infrastructure. This includes but is not limited to: • Utility infrastructure including electricity and gas distribution and supply, water supply, foul drainage and waste water treatment, telecommunications and gigabit <u>speed</u> broadband	Statement Chapter 11 – Historic Environment [AS-068](Revision D) concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford the Project would result in less than substantial harm to a number of designated and non-designated heritage assets, and a scheduled monument. The substantial public benefits and need for the Project, as set out in Chapter 5 of 5.6 Planning Statement [APP-085](Revision B), including supporting the UK’s net zero target, enabling the connection of new low carbon energy. With regard to Utilities, any utility infrastructure required by the Project will be provided.

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	Opportunities for appropriate renewable, low and zero carbon or district-scale energy production.	
Strategic Policy S14 - Health and Wellbeing	The Council is committed to improving the health and wellbeing of our residents and communities, promoting more active and healthier lifestyles, creating healthy living environments and reducing health inequalities through high quality placemaking. The Council will achieve this by ensuring that new development: • Contributes towards the strategic priorities of the Chelmsford Health and Wellbeing Plan to help reduce inequalities including health • Has good access to services and facilities to support daily life and provide for the needs of their communities including education, employment, retail, public transport, healthcare, social, community and greenspace • Is well designed to create safe, inclusive and accessible places for all users and encourage social interaction and wellbeing • Creates opportunities for healthy and active lifestyles including access to and the provision of new multifunctional green and blue infrastructure, spaces for play, recreation and sports, and better active travel including provision for safe, attractive and well-connected pedestrian and cycle routes Provides good quality housing both externally and internally, to provide a healthy living environment now and in the future • Supports the provision of cultural infrastructure and public art to create a sense of place and identity • Is climate resilient and as sustainable and energy efficient as possible to promote healthy environments • Provides opportunities for access to nature to support physical and mental health	<u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> The Applicant notes the content of Policy S14. Whilst the section on residential development is not relevant to the Project, the Applicant would respond as follows. 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192](Revision C) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The chapter covers an assessment of construction and operational (including maintenance) effects on: • Health related environmental change (for example air quality, noise, traffic and transport related effects) • Mental health and wellbeing • The perceptions of impacts arising from Electric and Magnetic Fields (EMFs) of the Project in relation to mental health and wellbeing. The Applicant recognises 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 [APP-192](Revision C) includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative

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	- Provides appropriate mitigation to avoid harmful health impacts/emissions. <u>In addition to the above, all new strategic scale residential developments (defined as development for of 100 or more units) will be required to demonstrate through the masterplan process how they the following have been considered the following in their place making objectives</u> In addition to the above, all new strategic scale residential development (defined as development for 100 or more units) will be required to demonstrate how they have considered the following in their place making objectives: - Opportunities for community involvement in the long-term management and stewardship of the new development - Opportunities for growing food such as allotments, community gardens and orchards to improve access to local healthy food - Creation of walkable neighbourhoods to support people to live healthy lifestyles having regard to the Essex Design Guide - a New Development Model for Essex - Livewell Development Accreditation Scheme - Creation of a physical environment where people have the resilience to cope with life's changes such as a dementia friendly environment - Incorporation of Sport England and National Design Guide Active Design principles - Provision of a mix of uses on site that support daily life including education, employment, retail, public transport, healthcare, social, community and greenspace - Opportunities to make a significant positive contribution to health and wellbeing. <u>For development of 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development in excess of 1,000sqm</u>	assessment is provided in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-284](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. 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 Project through engaging with residents 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 regular communication including letters, phone calls and meetings. 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 relation to Mental Wellbeing Impact Assessment (MWIA) workshops, the Applicant understands from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and anxiety associated with impacts on quality of life /

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	or more (excluding agricultural buildings) a Health Impact Assessment will be required to assess the likely positive and negative impacts on the health and wellbeing of different groups in the population, particularly those who may be more susceptible to poorer health outcomes, and on existing health services and facilitiesFor development of 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development in excess of 1,000 sqm (excluding agricultural buildings) a Health Impact Assessment will be required to assess the likely positive and negative impacts on the health and wellbeing of different groups in the population, particularly those who may be more susceptible to poorer health outcomes, and on existing health services and facilities. The assessment should include recommendations on how positive health impacts could be maximised and negative impacts on health and inequalities avoided or mitigated. The Council will require Health Impact Assessments to be prepared having regard to the most up to date advice and best practice for such assessments. Where significant impacts are identified, planning permission will be refused unless measures to meet the health service requirements of the development are mitigated. Developments which will have an unacceptable significant adverse impact on health and wellbeing which cannot be mitigated, or that fail to offer reasonable provisions, will be refused	wellbeing once the Project has been constructed (for example visual impacts on businesses and properties) as well as perceptions of the impacts of electric and magnetic fields on health and wellbeing. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192](Revision C) has identified opportunities for public awareness raising about electric and magnetic fields, which will form part of measures recommended for affected communities along the proposed route. The mitigation hierarchy has been applied to the design of Project, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies. During construction, the Project would comply with the good practice measures within 7.2 Outline Code of Construction Practice [REP3-025](Revision G) which has a number of measures that would avoid or reduce effects on health. The Project has been designed in accordance with National Grid design standards and will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024b), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project will already have

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		designed out potential effects from EMF to a level to meet health and safety standards. Cumulative impacts are assessed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281](Revision B). National Grid has prepared 7.14 Equality Impact Assessment [REP1-067] to assess the Project's potential impacts on vulnerable groups and protected characteristic groups, as defined under the Equality Act 2010. The Equality Impact Assessment demonstrates whether and how National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the Public Sector Equality Duty PSED. The assessment has identified that the construction and decommissioning phases may give rise to temporary negative equality impacts, particularly in relation to: • Diversions and closures of Public Rights of Way (PRoW), which may affect older people, disabled people, and those with limited mobility; • Increased construction traffic, which may impact vulnerable road users and those accessing community facilities; • Noise, vibration, and air quality changes, which may differentially affect children, older people, pregnant women, and people with sensory or respiratory conditions; • Visual changes, which may affect neurodivergent individuals sensitive to alterations in their environment.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM6 – New Development in the Green Belt	Within the Green Belt, inappropriate development will not be approved except in very special circumstances. A) New buildings Planning permission will be granted for the following exceptions to inappropriate development: i. buildings for agriculture and forestry; ii. provision of appropriate facilities for outdoor sport, outdoor recreation, and cemeteries <u>and burial grounds and allotments</u> as long as it preserves the openness of the Green Belt <u>and does not conflict with the purposes of including land within it</u>; iii. limited infilling in villages in accordance with Policy DM9; iv. limited affordable housing for local needs in accordance with Policy DM2; v. extensions or alterations to buildings in accordance with Policy DM11; vi. redevelopment of previously developed land in accordance with Part B of this Policy; vii. replacement buildings in accordance with Part C of this Policy.	These impacts are not expected to be substantial in nature and are mitigated through embedded design measures, good practice construction management, and additional mitigation where required. The project does not require the compulsory acquisition of residential properties, and no known equality impacts have been identified in relation to land acquisition. The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. The Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. <u>It is acknowledged that Chelmsford City Council disagree with this position.</u> Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in 5.6 Planning Statement [APP-085Revision B]), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of 5.6 Planning Statement [APP-085Revision B] consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the

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	B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary building/s) Where the proposal would contribute to meeting an identified affordable housing need, planning permission will be granted where the proposed development does not cause substantial harm to the openness of the Green Belt. For all other proposals, planning permission will be granted where the proposed development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing use and/or development. The Council will assess the development based on the following: - i the size, scale, massing and spread of the new development compared to the existing; and - ii the visual impact of the development compared to the existing; and - iii the activities/use of the new development compared to the existing; and - iv the location of the site is sustainable and appropriate to the type of development proposed. C) Replacement buildings Planning permission will be granted for the replacement of a building provided that: - i the existing building being replaced is of permanent and substantial construction; and - ii the new building is in the same use as the existing; and - iii the new building is not materially larger than the one it replaces; and - iv the new building would not be out of keeping with its context and surroundings and does not result in any other harm.	Green Belt. 5.6 Planning Statement [APP-085Revision B] <u>and the Applicants response to the second written questions (LUS 2.2)</u> details the Very Special Circumstances applicable in this instance to justify inappropriate development. <u>Whilst the need case justifies the Project's VSC, the current position as set out in National Policy Statement (NPS) EN-1 (2024), is that for critical national priority (CNP) Infrastructure, subject to the application of the mitigation hierarchy, the Secretary of State will take as a starting point that CNP meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '...the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non exhaustive, list of tests: where development within a Green Belt requires very special circumstances to justify development'. In addition, paragraph 4.2.17 of National Policy Statement EN-1 also confirms that '...the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non exhaustive, list of tests:</u> • <u>Where development within a Green Belt requires very special circumstances to justify development'.</u>

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	D) Local transport infrastructure Planning permission will be granted for local transport infrastructure which can demonstrate a requirement for a Green Belt location and would preserve the openness of the Green Belt and not conflict with its purposes.	
Policy DM8 – New Buildings and Structures in the Rural Area	A) New buildings and structures Planning permission will be granted for new buildings and structures in the Rural Area where the development will not adversely impact on the identified intrinsic character and beauty of the countryside and where the development is for: - i a local community facility where there is a demonstrated need; or - ii agriculture and forestry or the sustainable growth and expansion of an existing, authorised and viable business where it can be demonstrated that there is a justified need; or - iii local transport infrastructure and other essential infrastructure or development which supports existing or potential utility infrastructure; or - iv appropriate facilities for outdoor sport, outdoor recreation and cemeteries; or - v a rural worker's dwelling in accordance with Policy DM12; or - vi housing which secures the optimal viable use of a heritage asset or enabling development to secure the future of a heritage asset; or - vii housing which includes the re-use of redundant or disused buildings which leads to an enhancement to the immediate setting; or - viii an isolated dwelling which is of exceptional design quality <u>in that it is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more</u>	<u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> In accordance with criteria (A) the Project is an infrastructure project and is therefore a type of development considered acceptable in the rural area. With regard to criteria (B) within Chelmsford, the Applicant has adopted overhead line as the preferred technology choice. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226](Revision B) and 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228](Revision B). 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232](Revision B) and 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Parts 1 and 2 [APP-233 to APP-234](Revision D). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related

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	<u>generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area</u>; or - ix infilling in accordance with Policy DM9; or - x limited affordable housing for local needs in accordance with Policy DM2; or - xi extensions or alterations to buildings in accordance with Policy DM11; or xii redevelopment of previously developed land in accordance with Part B of this Policy; or - xiii replacement buildings in accordance with Part C of this Policy; or - xiv residential outbuildings in accordance with Part D of this Policy. B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary buildings) Planning permission will be granted where the proposed development would not result in harm to the identified intrinsic character, appearance and beauty of the area. The Council will assess the development based on the following: - i the size, scale, massing and spread of the new development compared to the existing; and - ii the visual impact of the development compared to the existing; and - iii the impact of the activities/use of the new development compared to the existing; and - iv the location of the site is appropriate to the type of development proposed. C) Replacement buildings Planning permission will be granted for the replacement of a building provided that:	to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), 'these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure'.

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	- i the existing building being replaced is of permanent and substantial construction; and - ii the new building is in the same use as the existing; and - iii the new building would not be out of keeping with its context and surroundings and does not result in any other harm. D) Residential outbuildings Planning permission will be granted for outbuildings to be used for purposes incidental to the enjoyment of the dwelling where the new outbuilding: - i is located within the curtilage of the dwelling; and - ii is ancillary in size, scale, and appearance to the host dwelling; and - iii is not self-contained independent habitable accommodation; and - iv is well designed and in keeping with its context and surroundings, and does not result in any other harm.	
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity	“A) Internationally Designated Sites Developments that are likely to have an adverse impact (either individually or in combination with other developments) on European Designated Sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Where appropriate, contributions from qualifying residential developments within the Zones of Influence as defined in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) will be secured towards mitigation measures identified in the RAMS. B) Nationally Designated Sites Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, on an exceptional	<u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity [AS-026](Revision C) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project.

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	basis, the benefits of the development clearly outweigh both the adverse impacts on the features of the site and any adverse impacts on the wider network of SSSIs. C) Locally Designated Sites Development likely to adversely affect locally designated sites, their features or their function as part of the ecological network, will only be permitted where the need and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained. D) Biodiversity and Geodiversity in Development Development proposals should <u>must</u>: i. Conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status and give appropriate weight to their importance; and ii. Incorporate measures and features into the design of new <u>development, including</u> –buildings, extensions or renovations to increase biodiversity; and iii. Avoid negative impacts on biodiversity and geodiversity, adequately mitigate unavoidable impacts and as a last resort compensate for residual impacts; and <u>iv.</u> Unless exempt, must provide a minimum 10% biodiversity net gain (20% on Chelmsford Garden Community and East Chelmsford Garden Community <u>subject to site constraints</u>) above the existing ecological baseline value of the site, or subsequent government standard, to be calculated and reported in accordance with local and national best practice guidance prevailing at the time of the application, and <u>for significant on-site enhancements or off-site gains</u>, to be secured for a minimum of 30 years after completion <u>of the development</u>.-	The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, ancient woodland and veteran trees, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will achieve a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation/enhancement. This is reported in the Biodiversity Net Gain Report [APP-299](Revision B). There is currently no legislative requirement for BNG in respect of infrastructure projects for which development consent is required.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	Applications for engineering and other operations, and <u>operations and</u> change of use in order to create biodiversity sites in appropriate locations, including sites associated with the Local Nature Recovery Strategy, will be supported.”	
DM17 – Trees, Woodland and Landscape Features	A) Woodland <u>Protected Trees and Woodland Planning permission will be granted for development proposals that do not result in unacceptable harm to the health, and do not result in an unacceptable future relationship, of a preserved tree, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands. Consideration will also be given to the impact of a development on aged or veteran trees found outside ancient woodlands, both now and in the future. Development proposals that have the potential to affect preserved trees, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands must set out measures to secure their protection. In exceptional circumstances there may be overriding public benefits arising from the development that could justify the removal of a preserved tree or trees. In such circumstances, a replacement tree, or trees, shall be provided of a size and type suitable for its location. In exceptional circumstances, and where there are overriding site constraints, financial contributions may be utilised to fund off-site tree planting.</u>Planning permission will be granted for development proposals that do not result in unacceptable harm to the health of a preserved tree, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands. Consideration will also be given to the impact of a development on aged or veteran trees found outside ancient woodlands, both now and in the future. Development proposals that have the potential to affect preserved trees, trees in a Conservation Area or Registered Park and Garden,	The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP [APP-300](Revision G). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP [AS-046](Revision G) sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. The Project will not impact on any trees in a conservation area or Registered Park and Garden. In relation to ancient woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity [AS-026](Revision C) lists the ancient woodlands identified within 200 m of the Project’s Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all ancient woodlands is presented within Appendix 8.1: Habitat Report, on Figure A8.1.3: Ancient Woodland Locations

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	preserved woodlands or ancient woodlands must set out measures to secure their protection. In exceptional circumstances there may be overriding public benefits arising from the development that could justify the removal of a preserved tree or trees. In such circumstances, a replacement tree, or trees, shall be provided of a size and type suitable for its location. B) Other Landscape Features Planning permission will be granted for development proposals that do not result in unacceptable harm <u>and do not result in an unacceptable future relationship,</u> -to natural landscape features that are important to the character and appearance of the area. Harm or loss of these features will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where there are overriding public benefits arising from the development. C) New Trees Three new trees per net new dwelling are required to be planted for all new housing development. All new strategic scale employment and infrastructure development (defined as development in excess of 1,000 sqm or 0.1 hectares) will be required to plant a significant number of new trees as part of landscaping requirements.”	[AS-028](Revision C). In addition, the Project has considered 11 woodlands to be ancient woodland within ES Chapter 8: Ecology and Biodiversity [AS-026](Revision C) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as ancient woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodlands and reduced impacts to one further ancient woodland. Out of the remaining ancient woodlands, one woodland Writtle-Writtlepark Wood is located within Chelmsford City Council (Section F of the Project route). The north-east corner of Bosmore Wood (part of the Writtlepark Wood complex) is partially within the Order Limits due to the removal and undergrounding of the 11 kV UKPN overhead line 4 m into the woodland. Undergrounding works would use delicate and precise techniques such as hand-digging or vacuum excavation to protect root structures. Bosmore Wood (part of the Writtlepark Wood complex) is also 14 m west, at the closest point, from a permanent access route (right of access only – no physical works) for construction of pylon

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		TB180. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy <u>of the 7.4 Outline Landscape and Ecological Management Plan [APP-323REP3-032]</u>. With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. An arboricultural survey was also undertaken between May 2023 and May 2025. Figure B.A.3 in the Ancient Woodland and Veteran Tree Strategy [APP-323REP3-032] shows the location of veteran trees. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP [AS-046](Revision G). Annex D of the Ancient Woodland and Veteran Tree Strategy (Revision D) [APP-323] lists the veteran trees within the Study Area and identifies the assumed mitigation. The Ancient Woodland and Veteran Tree Strategy ([APP-323]Revision D) states that based on the existing overhead line alignments without considering the LoD, this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B17 in the CoCP [APP-300](Revision G)). The Ancient Woodland and Veteran Tree Strategy [APP-323](Revision D) details the management outcomes for veteran trees. The final mitigation measures, remediation

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist. Within Chelmsford City (and Brentwood Borough), the Arboricultural Impact Assessment notes that a number of high and moderate quality features will be affected. A total of 49 individual trees will be removed; 27 groups of trees will be partly removed; 13 individual trees and 4 groups will be affected / managed; 60 individual trees and 7 groups will be retained with protection measures. Unavoidable tree loss will be compensated through the implementation of landscape design including new tree planting (refer to ES Chapter 13: Landscape and Visual [APP-226](Revision B) and the Outline LEMP [AS-046](Revision G)). The Outline LEMP notes that compensatory tree planting for individual trees and small groups of individual trees will be provided at a 3:1 ratio using local provenance stock of native species with awareness to pests and diseases, with species and numbers. Where possible vegetation lost during construction will be replanted in the

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM18 – Flooding/Suds	A) Planning permission for all types of development will only be granted where: - i it can be demonstrated that the site is safe from all types of flooding, either because of existing site conditions or through flood risk management from the development, now and for the lifetime of the development; and - ii it does not worsen flood risk elsewhere. B) In addition to above Part A) development within areas of flood risk will be required to: - i provide a safe dry refuge and a safe means of escape or suitably manage risk through some other means; and - ii manage surface water run-off so that the discharge rate will not exceed the equivalent 1 in 1 greenfield rate, unless there are overriding reasons for not doing so; and - iii locate the most vulnerable development in areas of lowest flood risk unless there are overriding reasons for not doing so; and - iv provide wider sustainability benefits to the community <u>such as water quality, biodiversity and amenity</u>, that mitigate flood risk. C) All major development will be required to incorporate integrated water management measures such as rainwater/stormwater harvesting to reduce surface water run-off and ensure that it does not increase flood risk elsewhere. The principal method to do so should be the use of Sustainable Drainage Systems (SuDS). As well as providing appropriate water management measures, where possible SuDS should be multifunctional to deliver amenity, recreational and biodiversity benefit for the built, natural (including green infrastructure) and historic environment.	same location as previously apart from where permanent infrastructure prohibits this. <u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> 7.9 Flood Risk Assessment [APP-331] has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the Project located in the Chelmsford City Council area (Section F of the Project route) are mostly located in Flood Zone 1. As addressed in 7.9 Flood Risk Assessment [APP-331] there are two pylons proposed in the floodplain in Section F that would need compensatory storage. The Risk of Flooding from Surface Water map (see 6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-224](Revision B)) shows that most of the land within Section F is at very low risk of surface water flooding. As shown in 7.9 Flood Risk Assessment [APP-331], where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. However, there are small parts of the temporary construction compound off Braintree Road, near TB134, Chelmsford (TB Main) shown to be at high risk of surface water flooding. The requirements for compensation of loss of floodplain storage

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	D) Surface water connections should follow the sustainable drainage hierarchy with connection to the public sewerage network only made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users. Surface water connections to the foul sewer will not be permitted, and only to a combined sewer in exceptional circumstances.	associated with these pylons is secured by commitment W17 in 7.2 Outline Code of Construction Practice [REP3-025](Revision G). Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid's technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. 7.2 Outline Code of Construction Practice [REP3-025](Revision G) describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority using suitable SuDS that are maintained for the Project's lifetime. 7.9 Flood Risk Assessment [APP-331] states that access roads and haul roads, as well as areas where

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM19 – Renewable and low carbon energy	Planning permission will be granted for renewable or low carbon energy developments provided that they: - i do not cause demonstrable harm to residential living environment; and - ii avoid or minimise impacts on the historic environment; and - iii can demonstrate no <u>significant harm</u> adverse effect on the natural environment including designated sites; and - iv do not have an unacceptable visual impact which would be harmful to the character of the area; and - v will not have a detrimental impact on highway safety. Where located within the Green Belt, renewable or low carbon energy developments will also need to demonstrate very special circumstances in order to be approved. For major renewable and low carbon energy proposals, a package of community benefits should be delivered to ensure a positive community legacy.	impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. <u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> The Applicant notes this policy in support of renewable and low carbon energy. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a Critical National Priority (CNP) for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. The Project includes works within the Metropolitan Green Belt. The works within Chelmsford comprise of standard height pylons (and low height pylons at Great Waltham, outside of the Green Belt). As outlined in Chapter 7 of 5.6 Planning Statement [APP-085](Revision B), National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
		Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in 5.6 Planning Statement [APP-085](Revision B)), it is nevertheless considered that there are very special circumstances which justify their acceptability. The Applicant notes Chelmsford's position set out in [REP1-153], [REP2-035] and [REP3-075] that the <u>Project represents inappropriate development in the Green Belt and that the</u> very special circumstances identified <u>by the Applicant</u> do not justify the harm caused by the development on the openness of the Green Belt. Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will <u>take as a starting point commence the decision-making process with the presumption</u> that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies, including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low carbon infrastructure,

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
Policy DM30 – Contamination and Pollution Policy DM31 – OPERATIONAL ENERGY AND CARBON (NET ZERO) IN HOMES AND BUILDINGS Net Zero Carbon Development (In Operation)	“A) New build development (residential and non-residential) All new buildings must be designed and built to be Net Zero Energy and Carbon in operation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use. All new buildings (1 dwelling and above for residential; 100m2 floorspace and above for non-residential) are required to comply with Requirements 1 to 5 as set out below... Requirement 2: Fossil fuel free i. No new buildings shall be connected to the gas grid; and ii. Fossil fuels must not be used on-site to provide space heating, domestic hot water or cooking. Requirement 3: Energy Use Intensity (EUI) limits...	encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development. In this context, the precedent established by national policy takes precedence over local policy, as the reinforcement and improvement of electrical national infrastructure is deemed a matter of paramount importance at the national level. <u>It is considered that the proposed modification to the policy does not change the assessment previously undertaken on this policy.</u> The need for the Project is to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK’s net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. A Greenhouse Gas Assessment (Appendix 4.1 Greenhouse Gas Assessment of ES Chapter 4: Project Description [APP-131](Revision B)) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	iii. The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent: – Offices 70 kWh/m² GIA/year – Schools - 65 kWh/m² GIA/year – Light Industrial 35 kWh/m² GIA/year For other residential and non-residential buildings, that are not covered by (i) and (ii) above, applicants should report their energy use intensity but are not required to comply with a certain limit. Requirement 4: On-site renewable energy generation Renewable energy must be generated on-site for all new developments <u>by</u> on, or near to, hazardous substance sites <u>by</u> whichever of the following results in the greater amount of roof top solar PV energy (electricity) generation <u>and the</u>: The amount of energy generated in a year should match or landexceed the predicted annual energy use of the building, i.e. renewable energy generation (kWh/m²/year) = or > predicted annual energy use (kWh/m²/<u>year</u>)*<u>year</u>); or iv. The amount of energy generated in a year is: — at least 80 kWh/m² building footprint per year* for all building types; and — at least 120 kWh/m² building footprint per year* for industrial buildings. *For development proposals where it is demonstrated to the satisfaction of the Local Planning Authority that meeting Requirement 4 is not technically feasible then renewable energy generation on-site should be maximised and the residual amount of renewable energy generation (equivalent to the shortfall in meeting the annual energy	CO₂e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of GHG emissions because of material use and construction activities.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	use of the building in kWh/year) must be offset by a financial contribution (to cover the administration, purchasing and installation of a solar PV renewable energy (electricity) system elsewhere in the plan area or County, which is contaminated or has a history of a potentially contaminating use, permission will only be granted where the Council is satisfied that: able to generate a similar amount of energy) and be paid into the Council's offset fund. The offset price is set at £ 1.35 <u>1.82</u> per kWh or the most recent updated version <u>published on the Essex Design Guide</u> and the contribution shall be calculated at the time of planning application determination. Requirement 5: As-built performance confirmation and in-use monitoring v. All developments must submit as-built performance information at completion and prior to occupation; and vi. In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation. Alternative routes to meeting policy requirements i. Proposals that are built and certified to the Passivhaus Classic or higher Passivhaus standard are deemed to have met Requirements 1 and 3. Requirements 2, 4 and 5 must also be met to achieve policy compliance..." ii.— For developments in or adjacent to an Air Quality Management Area, or where an air quality impact assessment has been provided, permission will only be granted where the Council is satisfied that after selection of appropriate mitigation the development will not have an	

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning Policy
	unacceptable impact on air quality and the health and wellbeing of people".	

1.4 Signposting for how the Project has had regard to Neighbourhood Plans

Table 1.243 Signposting with Neighbourhood Plan Policy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Section A			
<u>Swainsthorpe Neighbourhood Plan (Pre-Submission Draft December 2025)</u>	<u>Policy SWS9: Mitigating the Impacts of Energy Projects</u>	<u>The impacts on the Neighbourhood Area of energy infrastructure projects and associated developments (e.g. renewable energy projects, interconnectors, pylons, overhead wires, converter stations, pipelines etc.), including the cumulative impacts from multiple schemes, should be given significant weight in the determination of such schemes.</u> <u>The sensitivity to change of the relevant landscape character type should be given significant weight in the determination of proposals. This could include the prominence and appearance of the scheme.</u> <u>Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.</u> <u>All energy projects should seek to avoid/minimise any adverse impacts on the natural environment. High-value conservation sites, including designated sites should be avoided and the Local</u>	<u>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce environmental impacts through the process of design development, and by embedding measures into the design of the Project.</u> <u>Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (National Policy Statement (NPS) EN-1 and NPS EN-5 and the embedded environmental design mitigation as part of the Environmental Impact Assessment process.</u> <u>Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.</u>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		<u>Nature Recovery Strategy (LNRS) should also be used to inform site selection. Once a site is selected and approved, opportunities to enhance local biodiversity should be maximised with existing ecological features retained. Appropriate species-rich buffers (at least 15m wide) should be used around the margins of solar farms and these buffers should be maintained as dark corridors for wildlife.</u> <u>Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly where those impacts are most felt.</u> <u>Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied.</u>	<u>NPS EN-1 and NPS EN-5 set out the requirement to deliver good design, and the Applicant has responded to the criteria by which it will be assessed, following the Holford Rules and the Horlock Rules, in developing the Project. The Project team has sought to respond to the guidance to ensure that the Project is able to demonstrate that it adheres to good design through both process and outcomes. The 7.15 Design and Access Statement (Revision C) sets out how the Project reflected the four principles of good design in the Planning Inspectorate's Advice on Good Design.</u> <u>It is important to note that the design approach is also set within technical limitations to meet safety, security, cost effectiveness and operational requirements. These limit the scope for aesthetic or architectural customisation. Key elements like pylon size and substation layout are fixed by these functional needs.</u> <u>ES Chapter 13: Landscape and Visual (Revision B) presents the assessment of the likely significant landscape and visual effects that could result from the Project. The LVIA recognises that there will be significant landscape and visual effects of</u>

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		<u>the Project during its construction and operation (and maintenance).</u> <u>Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].</u> <u>There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure.</u> <u>The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA 6.13 Environmental Statement Chapter 13 - Landscape and Visual (Revision B).</u> <u>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The Outline LEMP (Revision G) refers to the retention, replacement planting and onsite habitat creation and enhancement of habitats in line with the BNG Report (Revision B).</u>	

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			<u>7.4 Outline Landscape and Ecological Management Plan [Revision G] was updated at Deadline 5 to include greater reference to the alignment of onsite planting proposals with the Local Nature Recovery Strategies (LNRs). There is also a commitment to consider the LNRs as a key part of the site selection criteria for BNG and seek to align any offsite planting of trees in relation to the 3:1 commitment, as far as practicable.</u>

Abbreviations

Abbreviation	Full Reference
AIS	Air Insulated Switchgear
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CPRSS	Corridor and Preliminary Routeing and Siting Study Report
CSE	Cable Sealing End
DCO	Development Consent Order
DNO	Distribution Network Operators
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESO	Electricity System Operator
GIS	Gas Insulated Switchgear
GW	Gigawatts
kV	Kilovolt
NSIP	Nationally Significant Infrastructure Project
NETS	National Electricity Transmission System
NETS SQSS	National Electricity Transmission System Security and Quality of Supply Standard
NGET	National Grid Electricity Transmission
Ofgem	Office of Gas and Electricity Markets
PEIR	Preliminary Environmental Information Report
SOBR	Strategic Options Backcheck and Review
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

Glossary

Term	Description
Alignment	The proposed overhead line and underground cable route.
Ancient woodland	Land that has been continually wooded since at least 1600 in England. Regarded as 'irreplaceable habitat' in national planning policy and guidance. Ancient woodland greater than 2 ha is recorded on the Natural England Ancient Woodland Inventory.
Biodiversity	The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part: this includes diversity within species, between species and of ecosystems.
Biodiversity Net Gain	An approach for developments to ensure habitats for wildlife are left in a measurably better state than they were before the development.
Cable	An insulated conductor designed for underground installation.
Cable Sealing End compound	Electrical infrastructure used as the transition point between overhead lines and underground cables. A compound on the ground acts as the principal transition point.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as defined in s69(1)(a) in the Planning (Listed Building and Conservation Areas) Act 1990.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Distribution Network Operator	Companies that own and operate the power lines and infrastructure that connect the National Grid network to individual properties.

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