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Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.6 Signed Statement of Common Ground - Babergh and Mid Suffolk District Council - Tracked Changes Version

Final Issue E

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A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
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1. Introduction

1.1 Overview

1.1.1 This draftfinal Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission pic (referred to as the Applicant within this document) and Babergh and Mid Suffolk District Councils (BMSDC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

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

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

1.2 Summary of matters under discussion

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

SoCG ID	Summary of matter under discussion	Deadline for resolution
Project development, description and design		
3.2.12 -Bramford substation	BMSDC expects the Applicant to demonstrate measures to protect residents, amenity, businesses, the highway network, landscape and the environment given the volume and nature of development at and around Bramford substation.	~~Resolution~~ is~~-~~ likely ~~by-~~ ~~Deadline-~~ TrDiscussions will conclude aft

SoCG ID	Summary of matter under discussion	Deadline for resolution
	The Applicant does not have legal authority, regulatory responsibility or funding to control the process of development around the substation, and notes that future development would need to provide cumulative assessment and proposed mitigation.	er finalisation of this SoCG
~~Ecology and Biodiversity~~		
~~3.3.6 – Survey methodology (bats)~~ ~~3.3.9 – Baseline conditions and receptors (bats)~~ ~~3.3.12 – Standard mitigation (bats)~~ ~~3.3.14 – Construction~~ effects3.2.14 - Legal Agreements	~~BMSDC have concerns regarding~~ level ~~of bat survey and construction~~ effects ~~upon bats. BMSDC calls for further survey~~ effort ~~which would~~ lead ~~to a better supported~~ estimation ~~of~~ impact ~~and the more confidently proportionate mitigation/compensation.~~ ~~No further bat roosting surveys are being undertaken. ECC considers that the~~ impact ~~assessment for roosting bats falls short of achieving reasonable confidence~~ in ~~both the~~ impact ~~magnitude prediction and the appropriateness of mitigation. ECC requests further information regarding the baseline conditions and receptors and standard mitigation for roosting bats.~~ ~~The Applicant has provided further clarification on the bat survey scope and notes Natural England's agreement with the bat roost survey scope.~~ The Applicant will secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.	~~Resolution~~ likely ~~by Deadline 7~~Discussions will conclude after finalisation of this SoCG through wording of the reguirements.
~~3.3.7 - Key parameters and assumptions3.2.15~~ - Compensation/Offsetting	National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. ~~BMSDC consider the assumptions regarding reinstatement to be tenuous. BMSDC~~ is ~~reviewing and will provide further comment following consideration around reinstatement~~ ~~The Applicant mainta~~ is that the key parameters and ~~assumptions presented are considered appropriate and has committed to a 5-year aftercare period for all replacement tree and hedgerow planting and to a 30-year aftercare period at Environmental Areas.~~	~~Resolution~~ likely ~~by Deadline 7.~~Discussions will conclude after finalisation of this SoCG through the draft DCO wording.
~~3.3.17 - Outline LEMP~~ ~~BMSDC raised concerns regarding the criteria used to define the bat hibernation potential of trees.~~ ~~The Applicant reiterates that Natural England haas approved the classification method of a~~		

SoCG ID	Summary of matter under discussion	Deadline for resolution
~~risk-based approach being taken when assessing trees for their hibernation potential for bats.~~ ~~Resolution~~ likely ~~by Deadline 7.3.3.18 – Biodiversity Net Gain –~~ **onsiteEcology and** ~~assessmentBiodiversity~~		
3.3.18 - Biodiversity Net Gain - ~~onsite and assessment~~ 3.3.19 - Biodiversity Net Gain - offsite	BMSDC requests clarification around off-site BNG. ~~The Applicant notes that thisThis~~ will be secured by legal ~~agreementrequirement~~ and delivered through collaboration with partners and purchased from commercially registered providers.	~~Resolution~~ likely ~~by Deadline~~ TDiscussions will likely conclude after finalisation of this SoCG.
~~3.3.20 – Arboriculture~~ Impact ~~Assessment~~	~~BMSDC position pending.~~	~~Resolution~~ likely ~~by Deadline 7.~~
~~**Noise and Vibration**~~		
~~3.5.1 – Policy and~~ legislation ~~and 3.5.5 – Key parameters and assumptions~~	~~BMSDC sought clarification on the definition of significant noise.~~ ~~The Applicant reiterates that significant~~ effects ~~are defined in **Section 4 of 6.14 Environmental Statement Chapter 14—Noise and Vibration [APP-256]** and are based on applicable guidance.~~ ~~The Applicant maintains that the parameters and assumptions presented are considered appropriate.~~	~~Resolution~~ likely ~~by Deadline 7.~~
~~3.5.6 – Baseline conditions and receptors~~	~~BMSDC raised concerns that not requested all receptor~~ locations ~~have been supplied.~~ ~~The Applicant signposts to **ES Figure 6.14.F1 Environmental Statement Figure 14.1 – Baseline Noise Data [APP-262]** where all receptor~~ locations ~~are presented and considered appropriate.~~	~~Resolution~~ likely ~~by Deadline 7.~~
~~**Health and Wellbeing**~~		
~~£7676 – Baseline conditions and receptors~~	~~BMSDC raised concerns that the baseline does not~~ include impacts ~~on non-resident populations.~~ ~~The Applicant considers the baseline condition and receptors presented are appropriate. The Applicant notes that~~ impacts ~~on tourism are assessed~~ in ~~**6.15 Environmental Statement Chapter 15—Socio-economics Recreation and Tourism [APP-265].**~~	~~Resolution~~ likely ~~by Deadline 7.~~
~~3.6.10 – Construction~~ effects	~~BMSDC do not accept that the conclusion that health and wellbeing~~ effects ~~would not be significant.~~ ~~The Applicant considers~~ it is ~~unlikely that the two parties will find a mutually agreed position, and therefore suggest th s matter~~ is ~~moved to Not Agreed.~~	~~Matter unlikely to be agreed.~~
~~3.6.11 – Operational (and maintenance)~~	~~BMSDC~~ is ~~reviewing the operational (and maintenance)~~ effects ~~relating to health and wellbeing~~	~~Resolution~~ likely ~~by Deadline 7.~~

SoCG ID	Summary of matter under discussion	Deadline for resolution
effects	~~and will provide the Applicant with an update once complete.~~	
Historic Environment		
~~3.7.7 — Embedded mitigation~~	~~BMSDC request further details regarding the embedded mitigation where a Mid Level of less than substantial harm has been identified to the significance of heritage assets. BMSDC is reviewing **5.15 Design Development Report [APP-122]** which addresses the main changes requested and considers all factors relevant to the changes. The Applicant maintains that the embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.~~	~~Resolution likely by Deadline 7.~~
£7A£3.7.8b- Standard mitigation (built heritage) - Commitment HQ7	BMSDC made recommendations regarding commitments H06 and H07 which the Applicant has responded to. The Applicant maintains that the standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features in a sensitive manner. Regarding H07, **6.14 Environmental Statement Chapter 14 - Noise and Vibration ~~[APP-256Revision~~ B]** did not identify any heritage assets in BMSDC that are residences that would be impacted by the Project. The current approach in H07 is considered appropriate.	~~Resolution likely by Deadline 7~~Discussions will conclude after finalisation of this SoCG.
~~3.7.11 — Operational (and maintenance) effects (built heritage)~~	~~BMSDC disagrees with the assessment of harm to Hall Farm House (1181726) and Barn about 30m West of Hall Farm House (1032806).~~ ~~The Applicant maintains that the assessment of~~ effects ~~during operation (and maintenance) presented~~ is ~~considered appropriate given the distances from the pylons.~~	~~Matter unlikely to be resolved.~~
~~**Landscape and Visual**~~		
~~3v&4 — Assessment methodology (including LVIA methodology and viewpoints)~~ ~~37S76 — Baseline conditions and receptors~~ ~~3.8.11 — Operational (and maintenance)~~	~~BMSDC has reservations regarding the methodology for assessing the value of views and the number of viewpoints.~~ ~~The Applicant~~ is ~~confident the assessment of~~ landscape ~~value~~ is ~~based on a robust and consistent approach, with clear transparent criteria and assessment grades,~~ in line ~~with the Landscape~~ Institute's ~~TGN 02/21 Assessing Landscape Value Outside National Designations. Recognition of the value of views was determined with reference to a~~	~~Resolution likely by Deadline 7.~~

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SoCG ID	Summary of matter under discussion	Deadline for resolution
effects	number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan.	
3TT7— Embedded mitigation 3.8.8 — Standard mitigation 3.8.9 — Additional mitigation 3.8.10 — Construction effects 3.8.11 — Operational (and maintenance) effects	BMSDC considers mitigation measures are not addressing substantial significant negative residual impacts. The Applicant considers the mitigation measures appropriate and adequate. BMSDC retains concerns on landscape and visual compensation. The Applicant considers that the mitigation hierarchy has been systematically applied throughout the design of the Project with wide levels of public and stakeholder engagement. Compensatory measures have been considered as part of the development of the Project but the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated.	Resolution likely by Deadline 7.
3.8.12 — Outline GeGR	BMSDC is reviewing the oCoCP in relation to landscape and visual and will provide the Applicant with an update once complete.	Resolution likely by Deadline 7.
3.8.13 — Outline LEMR	BMSDC retain concerns in relation to definition, scope and scale of term 'compensation'. ECC recommends that compensation measures be clearly distinguished from mitigation and BNG obligations. The Applicant maintains that all relevant measures are appropriate.	Matter is unlikely to be agreed during Examination.
Socio-economics, Recreation and Tourism		
3.9.1 — Policy and legislation	BSMDC state that no Economic Strategies, TourismA/isitor Economy Strategies, Skills plans or needs analysis have been reviewed as part of the assessment of regional and local policy, only Local Plans. This potentially skews the understanding of the existing economy and therefore the potential impact from this development. The Applicant has reviewed the Babergh & Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy and these broadly align with the Local Plan. It is considered that there are no material changes to the conclusions of the Socio-economics, Recreation and Tourism assessment.	Resolution likely by Deadline 7.
3.9.2 — Study area	BMSDC recognise that the Local Study Area has been expanded to a 3km radius as opposed to the 500m radius initially proposed. This is welcomed, but the Councils believe that this is still unacceptable.	Resolution likely by Deadline 7.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	The Applicant maintains the Local Study Area is appropriate.	
3.9.3 – Data sources	BMSDC have concerns regarding the validity of data used. The Applicant considers the data used to form the assessment robust.	Resolution likely by Deadline 7.
3.9.4 – Assessment methodology	BMSDC has concerns with the assessment criteria. The Applicant recognises that employment sectors differ in their proportionality and local importance across areas such as Mid Suffolk, Thurrock, and Basildon. Baseline data for each LPA has been gathered. To ensure consistency, a standard approach is applied across the Wider Study Area within the assessment.	Resolution likely by Deadline 7.
3.9.5 – Key parameters and assumptions	BMSDC asked for the assumptions to be reassessed based on cumulative impact from multiples NSIPs. The Applicant directs BMSDC to the assessment of cumulative effects set out in **6.17 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163],**	Resolution likely by Deadline 7.
3.9.6 – Baseline conditions and receptors	BMSDC requests updated data sources inform the assessment. The Applicant states that the assessment has used the most recent and reputable publicly available sources at the time of writing.	Resolution likely by Deadline 7.
3.9.8 - Standard mitigation	BMSDC notes standard mitigation but does not believe it is sufficient to mitigate impacts. The Applicant considers the standard mitigation to be appropriate and adequate.	Resolution likely by Deadline Discussions, will conclude after finalisation of this SoCG .
3.9.10 – Construction effests3.9.12 - Outline CoCP	BMSDC have confirmed that the content of the outline CoCP is being reviewed. BMSDC has concerns regarding the assessment. The Applicant recognises the importance of skills development and workforce planning and is committed to supporting these; the level of employment during construction is not considered significant when compared with other sectors.The Applicant is committed to continue discussions with BMSDC.	Resolution likely by Deadline 7Discussions will conclude after finalisation of this SoCG.
3.9.11 – Operational (and maintenance) effests	BMSDC has concerns regarding the assessment. The Applicant recognises that there could be indirect economic effects to individual businesses however, the Applicant considers the assessment of effects to	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	~~be appropriate. Through routeing, sitting and detailed design, the applicant has sought to reduce, as far as practicable, potential~~ impacts ~~on visitor attractions.~~	
~~3.9.12 — Outline~~ CoCP	~~BMSDC have made no comments~~ in ~~their Relevant Representations or their Local~~ Impact ~~Report regarding these matters which inform the application.~~ ~~The Appi cant proposes these matters are therefore moved to Agreed.~~	~~Resolution~~ likely ~~by Deadline 7.~~
Cumulative Effects		
~~3.10.1 — Policy and Legislation~~ 3.10.3 - Data Sources ~~3.10.5 — Key parameters and assumptions~~ ~~3.10.6 — Baseline conditions and receptors~~ XWvT — ~~Embedded mitigation~~ ~~3.10.8 — Standard mitigation~~ ~~3.10.9 — Additional mitigation~~ ~~3.10.10 —~~ ~~Construction~~ effects ~~3.10.11 — Operational (and maintenance)~~ effects ~~3.10.12 — Outline~~ CoGR	BMSDC have made no comments in their Relevant Representations or their Local Impact Report regarding these matters which inform the application. The Applicant proposes these matters are therefore moved to Agreed.	Resolution likely by Deadline 7.

1.3 Project Description

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

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
  - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or

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low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations

— Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB)

- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

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

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

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

1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

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

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2. Record of Key Engagement

2.1 Introduction

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

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

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

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between the Applicant and BMSDC. For some topics BMSDC are represented by Essex Place Services (EPS).

Table 2.1 Summary of Key Engagement between National Grid and BMSDC

Date	Format	Topic/description
General		
June 2022	Meeting	Informal project catch-up and PPA discussion
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.

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

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Date	Format	Topic/description
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the 2nd iteration of the Outline LEMP and Outline COCP.
March 2025	Meeting	All host authority workshop
May 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
May 2025	Meeting	All host authority workshop
June 2025	Email Correspondence	The Applicant issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	The Applicant issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
November 2025	Email	BMSDC provided their Relevant Representations to the Applicant following submission to PINS.
December 2025	Meeting	Meeting to progress SoCG (general)
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the Traffic, Transport and ProW sections of the Environmental Statement
November 2025	Meeting	All host authority workshop
December 2025	Meeting	Meeting to progress SoCG
January 2026	Meeting	All host authority workshop
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	Joint meeting with SCC to agree deadline 4 Statement of Common Ground approach
March 2026	Meeting	All host authority workshop
April 2026	Meeting	Meeting to discuss options for mitigation around Bramford substation
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
May 2026	Meeting	Meeting to discuss options for mitigation around Bramford substation

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Date	Format	Topic/description
July 2026	Meeting	Meeting to discuss the Statement of Common Ground
Ecology and Biodiversity		
July 2022	Email Correspondence	The Applicant shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - The Applicant presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from BMSDC and other authorities.
September 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Outline LEMP
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	The Applicant issued the Protected Species Proposed Mitigation Measures to stakeholders including BMSDC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant issued the BNG Strategy to stakeholders including BMSDC.
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the draft Biodiversity Net Gain Report.
January 2025	Email Correspondence	The Applicant shared the 2nd iteration of the Outline LEMP
January 2025	Meeting	The Applicant hosted a meeting to discuss comments received on the 2nd iteration of the Outline LEMP
May 2025	Meeting	The Applicant hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.

Date	Format	Topic/description
May 2025	Email Correspondence	The Applicant shared the next iteration of the Outline LEMP, including Appendix D - Outline Landscape Proposals
September 2025	Meeting	Option thematic group meeting to discuss feedback on the ecology section of the Environmental Statement.
January 2026	Meeting	Meeting to discuss the ecology aspects of the Statement of Common Ground (attended by EPS)
March 2026	Meeting	All host authority workshop
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss draft bat licences alongside Essex Place Services.
June 2026	Meeting	Meeting to discuss draft bat licences, ECoW and BNG with Essex Place Services.
Air Quality		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Air Quality assessment for review and comment.
Noise and Vibration		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
December 2025	Meeting	Meeting to discuss the Statement of Common Ground
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
Health and Wellbeing		
September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment, including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	The Applicant held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	The Applicant issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
Historic Environment		

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Date	Format	Topic/description
July 2022	Email Correspondence	The Applicant issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	The Applicant presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	The Applicant shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
October 2024	Meeting	Historic Environment Thematic Group Meeting - aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
February 2025	Technical Note	The Applicant shared the Heritage viewpoints documents and shapefiles.

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Date	Format	Topic/description
February 2025	Meeting	Historic Environment Thematic group meeting to discuss Heritage viewpoints
February 2025	Technical Note	The Applicant shared the draft Historic Environment Baseline Report.
February 2025	Meeting	Meeting to discuss the draft Historic Environment Baseline Report.
March 2025	Email Correspondence	The Applicant issued updated Historic Environment Viewpoints information to stakeholders including BMSDC.
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
June 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
June 2025	Technical Note	The Applicant shared the Archaeological Fieldwork Summary (review undertaken by EPS).
June 2025	Technical Note	The Applicant shared additional trench plans for Site 008, Area 22, north of the River Stour.
July 2025	Meeting	Archaeology Working Group Meeting
July 2025	Technical Note	The Applicant shared the combined SSWISI for Sites 005, 006 and 007 and associated trench plans.
July 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
August 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
September 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
October 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
November 2025	Meeting	Archaeology Working Group (meeting attend by EPS)
November 2025	Technical Note	The Applicant shared the WSI for the Phase 2 Geophysical Survey
November 2025	Technical Note	The Applicant shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group (meeting attended by EPS)
January 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with Essex Place

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Date	Format	Topic/description
		Services
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with SCC
January 2026	Meeting	Follow up meeting to discuss built heritage aspects of the Statement of Common Ground with Suffolk County Council
January 2026	Meeting	Meeting to discuss the archaeology aspects of the Statement of Common Ground.
February 2026	Meeting	The Applicant shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
March 2026	Meeting	Archaeology Working Group (meeting attended by EPS)
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
June 2026	Meeting	Archaeology Working Group Meeting.
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
May 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting (covering both heritage and landscape viewpoints). Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 - March 2024	Email Correspondence	The Applicant shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback

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

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Date	Format	Topic/description
	Correspondence	and Methodology.
March 2025	Email Correspondence	The Applicant issued the draft Arboricultural Impact Assessment.
May 2025	Email Correspondence	The Applicant shared the next iteration of the Outline LEMP including Appendix D - Outline Landscape Proposals.
January 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground.
January 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground with EPS.
March 2026	Meeting	Meeting to discuss the landscape aspects of the Statement of Common Ground with EPS.
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BMSDC's Local Impact Report
April 2026	Meeting	Meeting including Suffolk County Council to discuss and understand additional measures requested at Bramford and justification
May 2026	Meeting	Meeting to discuss the Statement of Common Ground with Essex Place Services.
May 2026	Meeting	Further meeting including Suffolk County Council to discuss and review additional material received on measures requested at Bramford and justification
June 2026	Meeting	Meeting to discuss the Statement of Common Ground with Essex Place Services combined with SCC.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground with Essex Place Services combined with SCC.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate.
June 2023	Technical Note	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.

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Date	Format	Topic/description
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	The Applicant held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical Note on the ES Chapter.
March 2025	Email Correspondence	The Applicant issued the third Technical Note for Socio-economics, Recreation and Tourism to stakeholders including BMSDC.
October 2025	Meeting	Option thematic group meeting to discuss feedback on the Health and Wellbeing section of the Environmental Statement.
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground

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3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

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

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

Table 3.1 Agreement status for matters presented in Section 3

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

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

3.1.4 Table 3.2 to Table 3.10 provides the matters agreed, not agreed-© under discussion or not applicable in relation to the various topics.

3.2 Project development, description and design

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **Applicant's Comments on Local Impact Reports [REP2-030],**	BMSDC Response to Targeted Consultations (March 2025): BMSDC acknowledge the stated need case for a scheme of electricity transmission network capacity improvement to enable connection of offshore wind generation, required to meet net zero commitments, and to increase capacity of the transmission network to meet this additional demand, as reiterated by the Hiorns report.	Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case - when offshore wind farms are contracted to connect to the UK network - the first of which are contracted to connect in 2030. The Applicant is	BMSDC Response to Targeted Consultations (March 2025): BMSDC suggest the project is premature, whilst there is a known and recognised likelihood of alternative technologies and / or infrastructure design	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed,	arrangements, that a strategic approach to energy infrastructure planning through the responsibilities of the imminent National Energy System Operator (NESO) and Regional Energy Strategic Planner (RESP) functions, and recognising the findings of the Hiorns report that the need for additional transmission capacity is more likely be closer to 2035 than National Grid's programme delivery date of 2030.	
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental,	Whilst BMSDC recognise the findings of the East Anglia study the councils maintain a preference for a coordinated offshore solution.	Not agreed

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		technical, socioeconomic and financial implications for alternative routes, including offshore alternatives. For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives - Offshore Alternatives' in **Applicant's Comments on Local Impact Reports [REP2-030L** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed,		
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering	BMSDC Response to Targeted Consultations (March 2025): BMSDC would prefer more undergrounded sections of the route. BMSDC acknowledge the concerns of our communities regarding the impact of overhead line development and will continue to reguest consideration of undergrounding where appropriate.	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills. For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice - Overhead Line and Underground Cables' in **Applicant's Comments on Local Impact Reports [REP2-030L** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Project development process - Design				
3.2.5	Waveney Valley	At the statutory consultation in 2024, the Applicant presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation technigues for underground	BMSDC Response to Targeted Consultations (March 2025): The omission of the Waveney Valley alternative is disappointing, and the councils will continue to reguest consideration of undergrounding where appropriate	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		cables in response to GI surveys and the Waveney and Little Ouse Recovery project. For the Applicant's position on the Waveney Valley, please refer to Section 3.5 'Alternatives - Waveney Valley' in **Applicant's Comments on Local Impact Reports [REP2-030L** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Project development process - Consultation				
3.2.6	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 - 16 June 2022. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	No reason to dispute. No other comments	Agreed
3.2.7	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 - 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report. The non-statutory consultation was undertaken in accordance with the	No reason to dispute. No other comments	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		published Consultation Strategy.		
3.2.8	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the Statement of Community Consultation (SoCC). Responses to feedback received during statutory consultation is contained within the **5.1 Consultation Report [ARP-06SRevision BI.** The statutory consultation was undertaken in accordance with the published SoCC.	BMSDC look forward to seeing the consultation feedback report. No reason to dispute. No other comments	Agreed
3.2.9	2025 targeted consultation	Targeted consultations for Suffolk took place from 30 January 2025 - 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation is contained within the **5.1 Consultation Report [APP-066Revision BI.** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated	No reason to dispute. No other comments	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).		
Other matters as required				
3.2.10	Community Benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. ~~Later~~ in ~~spring 2026,~~ theThe Applicant will begin consulting jix July 2026 on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent and construction starting. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits. National Grid welcomes ongoing dialogue with BMSDC on community benefits. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as	The councils recognise the emerging position from government towards a package of recommendations for community benefits from electricity transmission infrastructure development, including the Bill Discounts Scheme. If the councils' communities are to host this development NGET should offer a reasonable, proportionate and practicable package of community benefits, outside the scope of the necessary and expected mitigation and compensation measures for the DCO. BMSDC consider this matter to be not agreed, noting both parties commit to further dialogue regarding community benefits following DCO examination.	Not agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Not Agreed.		
3.2.11	Supply and connectivity around the Freeport at Gateway 14	The Applicant liaises regularly with electricity Distribution Network Operators (DNO). In East Anglia that is UK Power Networks (UKPN). Potential opportunities to rationalise, or make new connections to, the local network, or high demand centres, such as Gateway 14 requires a combination of the developer, the DNO and The Applicant identifying a need case that would be supported by the regulator, Office of gas and electricity markets (Ofgem), or funded by some other means. The Applicant is required under its transmission licence, to make connections where applications are made including to local networks or demand centres. If a connection application is made, the Applicant would progress it accordingly.	BMSDC Response to Targeted Consultations (March 2025): BMSDC consider potential benefits, through appropriately coordinated delivery of interrelated energy projects and network infrastructure, could include improved connectivity for Freeport East at Gateway 14 as well as other major commercial operations and other interests in the area. BMSDC are calling on NGET to recognise and act upon the value such strategic coordination will add to the Norwich to Tilbury project, the wider Great Grid Upgrade objectives by enabling effectively, appropriate and sustainably planned local generation and storage for focused local distribution and consumption as part of the government's priorities for a decarbonised economy and to contribute to the challenge of fuel poverty.	Not agreed
3.2.12	Bramford substation	The Energy Market is a free market where applicants apply to connect to the transmission system. The Applicant is obliged to connect any generation customer who signs a connection offer from the National Energy System Operator. The connecting generation customers fund their projects independently and must secure the appropriate land rights and necessary planning approvals such as a Development Consent Order or planning	Given the volume and nature of reasonably foreseeable development at and around the Bramford substation a strategic approach to the project design and delivery, having regard to the cumulative impacts and interactions with other developments in the area, is considered necessary to minimise impacts on the surrounding communities, public safety, landscape, heritage and highway network. In particular, the councils expect NGET to demonstrate measures are in place to protect residents, amenity, businesses, the highway network, landscape and environment having regard to the	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		approval under the Town and Country Planning Act 1990 considering cumulative effects with other developments as necessary. The Applicant has neither legal authority, regulatory role nor funding to exert control over this process in the manner suggested but notes that those with planning approval responsibilities can influence the outcome and secure co-ordination to some degree. Other unknown future development that comes forwards and seeks to connect into Bramford Substation would be subject to its own consenting and / or approval process which would likely need to provide its own cumulative assessment and implement any appropriate mitigation to avoid, prevent, reduce and / or offset (where relevant and appropriate) adverse effects on the environment. ~~The Applicant welcomes ongoing~~ engagement ~~with BMSDC~~ in ~~relation to this matter.~~ The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	need to safeguard access to the sub station in the interest of resilience of the transmission network as critical infrastructure. BMSDC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	
3.2.13	Furthering the purposes of the National Landscape	The Applicant consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural	Babergh District Council welcomes the proposed funding of a feasibility study for the removal/rationalisation of existing 132kV overhead lines east of Bramford Substation.	Agreed

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		beauty' in accordance with s85 of the CRoW Act, is set out in **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (fAPP-120)J.** Part of this approach includes the provision of a Dedham Vale National Landscape Fund in addition to the commitment to an initial feasibility study to assess feasibility for the potential PJ Line removal, an existing UK Power Networks overhead line running between Lawford and south of Bramford. The measures identified are sufficient, appropriate and proportionate in accordance with Defra guidance and national policy. The approach follows the Defra guidance (Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes) with the additional measures proposed to be secured by a legal agreement. Engagement with the Dedham Vale National Landscape Partnership and relevant stakeholders is ongoing. For the Applicant's position on furthering the purposes of the National Landscape, please refer to Section 3.11 'Furthering the Purposes of the National Landscape' in **Applicant's Comments on Local Impact Reports rREP2-030].** See also	Mid Suffolk: N/A.	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		row 3.2.14 below regarding legal agreements.		
3.2.14	Legal agreements	National Grid will secure measures to support the discharge of the statutory duty under section 245 of the Levelling-up and Regeneration Act 2023 (the 'furthering the purposes' duty) through a bilateral obligation with Suffolk CC under section 106 TCPA 1990. An updated unsigned agreement was submitted at Deadline 6 in **8.25 National Landscape - DRAFT - Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [REP6-126],** Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting resulting from the commitment to replace individual trees and individual trees in small groups at a ratio of 3:1, by requirement and not by a unilateral s106 agreement. The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BMSDC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Under Discussion
3.2,15	Compensation / offsetting	As explained by Counsel for National Grid at ISH4, National Grid is also proposing a commitment to secure landscape	BMSDC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is	Under Discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in **8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 rREP6-118],** should the Secretary of State consider the measures necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	retained as Under Discussion.	

3.3 Ecology and Biodiversity

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025:	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [ARR-42SRevision B] and 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity of the ES [AS-02SRevision C].** All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	• The ES has identified the relevant legislation, policy and guidance. BMSDC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	
EIA - Approach and Methods				
3.3.2	Study area	The study area was agreed through the EIA **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources (Desktop)	Sufficient desktop data has been collected to inform the assessment as presented within **Section 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~[AS-026Revision~~ C].**	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • Sufficient desktop data has been collected for the ES.	Agreed
3.3.4	Assessment methodology	The methodology for assessing Ecology and Biodiversity was agreed through the EIA **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Ecology and Biodiversity was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey	The Applicant issued a Technical Note in	BMSDC provided the following comments in their	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
	Methodology	May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. The methodology and scope were subsequently agreed with local authorities. In response to the comments received regarding identification of smaller ancient woodland parcels, Thethe Applicant has undertaken field survey work across 2023 - 2025, including habitat assessments of woodland blocks, to identify any smaller pockets of ancient woodland that are not currently on the Ancient Woodland Inventory.	Relevant Representation dated 27 November 2025: • The survey methods used are largely accepted, although note the comments made for ID 3.3.6.	
3.3.6	Survey Methodology (Bats)	The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England ~~FREP4-081~~Revision D],** as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and**	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • Whilst bat roost climbing inspections for every PRF-M and FAR tree at risk of impact is perhaps not a practical expectation, BMSDC believes further survey effort prior to DCO consent is feasible. Enough at-height inspection surveys should be possible to facilitate a data-based estimation of the percentage of the PRF-M and FAR trees that will support non-minor bat roosting and will be lost to the project. This would lead to a better supported estimation of impact and the design of a more confidently proportionate mitigation/compensation scheme. • Place Services Ecology comments 01/05/26 - The discourse with the Applicant has moved away	~~Under discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Biodiversity ~~rAS-026Revision~~ B] includes a reasonable worst-case assessment of impacts on potential roost features. The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** Natural England advice related to bats is provided in **8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England [REP4-307].** This letter states Natural England support for our bat survey approach and confirms that broad principles of bat mitigation have been agreed. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with Babergh and Mid Suffolk District Councils and has been added to **7.4 Outline Landscape and**	from the bat survey method and is now focusing on a agreed level of bat roost tree resource compensation. This is in discussion; the Applicant understands my position as it was clarified during our 23/04/2026 meeting. ♦-This Matter was agreed during a call held on 11 June 2026, subject to the agreed wording on bat compensation being added to the Outline LEMP at Deadline 6.	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Ecological Management [Revision G], The Applicant considers this matter Agreed.		
3.3.7	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026Revision C].** The key parameters and assumptions presented are considered appropriate. The Applicant has committed to a d-yearfive-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for DCO projects of this scale. This is further strengthened by embedded commitments to high-quality planting specifications, ongoing monitoring, and adaptive management, including replacement of failed planting where necessary, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [APR-233Revision B].** The Applicant does not agree that an	BMSDC provided the following comments in their relevant representation dated 27th November 2025: • The Key Parameters of Assessment and Assumptions stated in section 8.4.28 of the ES are acknowledged. The assumption regarding habitat reinstatement, "*Reinstatement: Habitat removed during construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4))",* is considered tenuous to apply for all situations along the construction corridor, given the minimal 5-year post completion time limit for habitat reinstatement. A mutually agreed replacement planting failure percentage should be factored into the compensation reguirement. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under further review and that BMSDC will provide further comment following consideration around reinstatement. BMSDC position: BMSDC should be on record has foreseeing potential failure rate issues with that length of management. Some degree of compromise might be achievable if NG makes a suitable commitment to high-quality care within the 5yr management period.	Under discussionNot Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		assumed failure rate or additional compensation provision is necessary or justified, as the secured approach already provides a robust, flexible and responsive framework to ensure successful establishment. Taken together, these measures provide confidence that habitat reinstatement will be effectively delivered and maintained, and that the proposed approach represents a proportionate, policy-aligned and deliverable solution. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Baseline Conditions				
3.3.8	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C].** The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • Circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; BMSDC position pending. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline conditions and receptors for bats which reguires further information and is	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			discussed in ID 3.3.9.	
3.3.9	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity** ~~rAS-026Revision~~ **C].** The baseline conditions and receptors presented are considered appropriate. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England** ~~[REP4-081~~**Revision D],** as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity** ~~rAS-026Revision~~ **C]** includes a reasonable worst-case assessment of impacts on potential roost features. The survey approach to bat roost surveys has been agreed with Natural England and is considered a pragmatic approach to a	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • Note also the comments made for ID 3.3.8. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2025 that the baseline conditions and receptors for roosting bats requires further information and review. Place Services Ecology comments same as ID 3.3.6. Agreed as per ID 3.3.6.	~~Under discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has provided further details regarding the approach to bat tree roost surveys in response to BIO 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with Babergh and Mid Suffolk District Councils and has been added to **7.4 Outline Landscape and Ecological Management [Revision G],** The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed.		
EIA- Embedded, Standard and Additional Mitigation Measures				
3.3.10	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C|.** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		The Applicant can confirm the mitigation hierarchy will be rigorously applied, avoiding impact wherever possible. An extensive change control process is used which includes changes to avoid as many sensitive ecology features as possible.		
3.3.11	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026Revision C]** and set out in **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G],** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • The standard mitigation measures summarised in the ES section 8.6 and stated in the OCoCP are largely appropriate and anticipated as adequate if effectively implemented. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to standard mitigation for bats which can be found in ID 3.3.12.	Agreed
3.3.12	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C]** and set out in **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ GI.** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Given the transient nature of bat roosts	BMSDC provided the following comments in response to their review of the Statement of Common Ground dated 14 October 2025: • However, measure B16's assumption that any action requiring a Natural England derogation licence can be *"reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit"* is considered unsound. BMSDC considers that the widespread lack of effective post mitigation licence monitoring does not allow for reliable 'reasonable anticipation' of success in situations where derogation licensing is covering non-minor	~~Under-Discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		within trees, pre-commencement surveys will ensure all bat roosts are identified prior to construction and are the best means of protecting the bats themselves and providing any compensatory roost mitigation that may be required. Where the presence of a roost is confirmed, mitigation measures to be agreed with Natural England would be delivered under licence to ensure no impact on the favourable conservation of bats. The Examining Authority can therefore be reassured that the requirements of The Conservation of Habitats and Species Regulations 2017 for roosting bats have been met. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with Babergh and Mid Suffolk District Councils and has been added to **7.4 Outline Landscape and Ecological Management [Revision G],** ~~The Applicant welcomes ongoing engagement with BMSDC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to update the status of this matter.~~	impacts. This is particularly relevant to the concerns in relation to bats as stated for ID 3.3.14. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that the standard mitigation for bats reguires further information and review. Place Services Ecology Comments same as ID 3.3.6. Agreed as per ID 3.3.6.	
3.3.13	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of	BMSDC provided the following comments +n-in their Relevant Representation dated 27 November 2025:	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C]. Additional mitigation is considered appropriate and adequate, In terms of its nature and scale, to address potential effects.	e See above comments regarding habitat reinstatement and protected species derogation licensing BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	
EIA - Assessment Conclusions				
3.3.14	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity** [AS 026Revision ~~Q],~~ The assessment of effects during construction presented. Tables 8.23 and 8 24 within **6.8 Environmental Statement Chapter 8 - Ecology an<? biodiversity** [AS 026gevision ~~CJ~~ do not restate a specific timeframe for residual effects because the duration of impacts hais already been assessed and defined within the magnitude assessment using the □nrppH rotnnnrinQ n f Qhnrt form fun tn 1 X> . medium term (1–10 3 an?,™, term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance	BMSDC provided the following comments in-in their Relevant Representation dated 27 November 2025 * If vvQjjid be useful transparency to advise on how long is it predicted to take for the long-term neutrality to be achieved for the affected receptors. . The completion of only GLTAs is a significant constraint to the roosting bats impact assessment. Impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision, * BMSDC considers that the impact assessment for roosting bats falls short of achieving reasonable confidence in « <h. impact mapnitude prediction and the appropriateness of mitigation, Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was undertaken at only 12 discrete locations, which	~~Under-discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated. The bat roost survey scope was agreed with Natural England, as evidenced within **5.9.13 Draft Statement of Common Ground - Natural England** [illegible] statutory advisor and competent authority on roosting bats. The Applicant disagrees with comments that insufficient bat surveys have been undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. **6.8 Environmental Statement Chapter 8 - Ecology and Ri** [illegible] includes a reasonable worst-case assessment of impacts on potential roost features. The Project as currently proposed has not identified any impacts to bat roosts which would likely constitute an offence under the legislation, with no bat roosts identified that would be lost/disturbed and therefore no current requirement for a bat licence. Should a bat roost be identified during	must cover only a fraction of the overall potential for bat roost tree impacts. This conclusion is based on ES Table 8.23 which describe that, *"the trees that have been identified for complete removal comprise: 113 trees with PRF-M, 257 trees with PRF-I, 801 FAR trees* [any number of which could be classified PRF-M after further survey] *and 16 trees with hibernation features."* As a consequence of the restricted survey effort, there is no quantitative transparency as to how many non-minor and minor bat roosts could be collectively lost, the highest significances of roosts that could be lost, and the extent to which the different (especially non-barbastelle) bat species within Essex Districts may be affected. • The potential impact without any mitigation measures being applied is described in the ES Table 8.23: "In the absence of mitigation, the direct loss of roost features and disturbance to roosting bats would have a permanent medium negative effect (large negative in the event of a loss of a maternity roost - mortality) that would be irreversible (in the event of mortality) or reversible in the medium-term if bats are not present at the time of removal. Bats are known to frequently change roost locations and may seek alternative, retained roosting resources within the Order Limits. Effects would be considered significant." However, the residual impact assessment assumes that, whatever the number and significance of the bat roosts that end up being destroyed, doing so under derogation licence(s)	

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		pre-commencement surveys a licence would be obtained from Natural England, the same tests will therefore apply as above, and the favourable conservation status of bats will be maintained. Following a meeting in May 2026 National Grid submitted to the Local Planning Authorities a bat resource compensation proposal for consideration. This includes the provision of bat boxes/veteranisation of 10 % of the potential bat roosting features lost ~~in any one Project Section.~~. Details of the agreed bat box compensation scheme were added to **7.4 Outline Landscape and Ecological Management rREP6-084]** at Deadline 6. The Applicant considers this matter Agreed.	(i.e. the expected delivering of two compensation bat boxes per roost lost, as stated in ES Table 8.23) will inevitably result in a cumulative negligible impact on all affected bat species/populations. Given our concerns stated in ID 3.3.11, this is not considered to be a reasonably supported assessment. • What is being proposed is a guasi District Level Licence-type approach for roosting bats (i.e. getting DCO without first completing surveys), when BMSDC is not aware of any such DLL method for bats having been trialled and approved. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around timeframes. Place Services Ecology comments same as ID 3.3.6 This Matter was agreed during a call held on 11 June 2026, subject to the agreed wording on bat compensation being added to the Outline LEMP at Deadline 6.	
3.3.15	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity rAS-026Revision C]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	BMSDC provided the following comments in-in their Relevant Representation dated 27th November 2025 • The assessment of effects during operation (and maintenance) is considered appropriate.	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.16	Outline CoCP	**7.2 Outline Code of Construction Practice ~~[REP4-164Revision~~ G]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C]** and is appropriate for managing construction impacts from the Project. Full details of the ECoW's qualifications / experience will be provided within the final CoCP which is to be approved by the relevant local planning authority. What classifies as a suitably qualified ECoW will depend on the specific task to be undertaken and the protected species or habitat in question. Some examples of minimum standards which would be required include a minimum of £three years relevant post graduate experience in ecological supervision of construction works; membership (or eligibility for membership) of a relevant professional body, such as the Chartered Institute of Ecology and Environmental Management (CIEEM); and holding of any species specific licences required to supervise works affecting legally protected species, where applicable. This role will not be undertaken by one individual, but by multiple ecologists with a range of	BMSDC provided the following comments in-in their Relevant Representation dated 27 November 2025 • Given the critical importance of the ECoW oversight and influence throughout the construction stage of the project, we would welcome a commitment as to the minimum qualifications/experience levels of the ECoWs to be used for specific tasks. We also advise a clarification of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs (of varying levels) employed on the project. B10 - Potential Roost Features (PRFs) should be identified by a Natural England bat survey class licensed (level 2+ if endoscoping required) ecologist or ECoW. This is advised to clarify who should be accepted as a "competent" person for PRF ~~classification.B16classification.~~ B16 - see comments for ID 3.3.11. BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Ecological Clerk of Works. Place Services Ecology comments 01/05/26 - This was discussed with the Applicant on 23/04/2026. I believe there is common ground in the desire to ensure effective ECoW function during the construction phase of the project. Both the Applicant and I agreed to think further on a suitable description	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		relevant experience and any protected species licences necessary for the specific task to be undertaken. Further details on the number and type of ECoWs required across the Project will be included within the Final Landscape and Ecological Management Plan (post-DCO consent). Further details on the Ecological Clerk of Works iswas included in the Applicant's response to BIO 1.26 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The remit of the Ecology Working Group will include review of individuals within the core ECoW team (once known post-consent), as a mechanism to demonstrate individuals have sufficient ECoW experience to adequately fulfil the role.	of the necessary qualifications/experience required, Applicant mentioned a possibility that an Ecology Advisory Board could review (presumably vet) and give approval for appointed ECoWs, which seems a good proposal.	
3.3.17	Outline LEMP	**7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity ~~rAS-026Revision~~ C]** and is appropriate. Natural England (the statutory responsible body for bats) has approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when	BMSDC provided the following comments in-in their Relevant Representation dated 27 November 2025 • With respect to paragraph 6.1.8, what is the criteria used for defining a tree's bat hibernation potential? Given that there appear to be fewer trees with hibernation potential than the totals for PRF-I and PRF-M, how does the hibernation criteria exclude certain PRF-I and PRF-M features? BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further	~~Under-~~ ~~€ scuss~~ anAc reed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility. The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated GLTA survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above. ~~The Applicant welcomes ongoing engagement with BMSDC in relation to this matter. Should it be considered that respective positions remain unchanged following further discussion, it may be appropriate to update the status of this matter to 'not agreed'.~~ The Applicant has agreed a bat box compensation, the wording for which had been agreed with	clarification is sought around bat hibernation. Ecology comments 01/05/26 - 1still don't think the Applicant is properly identifying the hibernation roost potential of trees, but again this can fall under the discussion being had concerning the compensation offering for the overall bat roost tree resource impact of the project This Matter was agreed during a call held on 11 June, subject to the agreed wording on bat compensation being added to the Outline LEMP at Deadline 6.	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Babergh and Mid Suffolk District Councils and has been added to **7.4 Outline Landscape and Ecological Management FREP6-0841** at Deadline 6. The Applicant considers this matter Agreed.		
Other matters as required				
3.3.18	Biodiversity Net Gain (BNG) - Onsite and Assessment	The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. **7.1 Biodiversity Net Gain Report ~~rAPP-299Revision~~ B]** sets out the approach to BNG. The Applicant has provided a response regarding BNG and planting aftercare periods in Section 3.13 'Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** No concerns have been raised by BMSDC to National Grid on the assessment approach to BNG or the onsite mitigation proposals, with the exception of the five-year habitat management and monitoring period for the reinstatement planting. Although not technically applicable to this Project, newly released BNG guidelines (June 2026) do not require any management or maintenance	BMSDC would like this matter to remain under discussion. This matter cannot be considered fully accepted and agreed until the issue presented in ID 3.3.7 is resolved. Place Services Ecology Comments 01/05/26 Agreement with NG regarding ID 3.3.7 is still a reguisite for achieving agreement on ID 3.3.18. The reinstatement planting has to be effective in achieving a state of neutral habitat impact, so than habitat enhancement (BNG) can then occur. BMSDC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		of reinstatement planting. National Grid therefore stands by its position that the provision of five-years management and maintenance period for reinstatement planting is more than adeguate, and its success can be sufficiently relied upon to include within the onsite BNG metric. The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.3.19	Biodiversity Net Gain (BNG) - Offsite	The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. **7.1 Biodiversity Net Gain Report** ~~**[APP-299Revision**~~ **B]** sets out the approach to BNG. Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain Report** ~~**rAPP-299Revision**~~ **B],** the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). ~~Off-site~~Offsite BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat condition,	BMSDC confirmed in meeting regarding the Statement of Common Ground in January 2025 that this matter is still under discussion, and that further clarification is sought around Offsite BNG. Place Services Ecology Comments - This likely needs to stay under discussion until more details of the planned off-site BNG provider(s) are revealed. BMSDC is committed to continue discussions with the Applicant, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Under discussion

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		cost and timings amongst others, including the local nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances. Offsite BNG will be ~~secured by a~~ legal ~~agreement and~~ delivered through collaboration with partners and purchased from commercially registered providers. Following review the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, by requirement and not by a unilateral s1Q6 agreement The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.3.20	Arboricultural Impact Assessment (AIA)	The level of detail within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report** ~~**rAPP-236Revision**~~ **B** is based on the methodology outlined in Appendix J of **6.19 Scoping Report [APP-296]** and is considered appropriate for this stage of the Project.	A number of notable and high value Category A trees are proposed for removal as part of this project. In some cases, this will involve the loss of irreplaceable habitat and therefore will have a significant adverse impact which cannot be compensated effectively with mitigation measures. However, if retention of these trees is not reasonably practical, the AIA and protection and mitigation methodology can be agreed in principle with acknowledgement of these unavoidable losses.	~~Under discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			BMSDC confirmed ~~in meeting regarding the Statement of Common Ground in January 2Q25~~via email in June 2026 that this matter is ~~still under discussion~~agreed.	

3.4 Air Quality

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [ARR-420Revision B]** and Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [App_447D_vision R1]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by National Grid	Agreed
EIA - Approach and Methods				
3.4.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. BMSDC provided the following position in their	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Inspectorate.	Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Application	
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 **6.7 Environmental Statement Chapter 7 - Air Quality** ~~**rAPP-147Revision**~~ **B|.**	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant	Agreed
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through the EIA **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant	
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [ARR-447Revision B I.** The key parameters and assumptions presented are considered appropriate.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	Agreed
EIA - Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air uality FAPP-14-7Revision BI Thp** baseline conditions and receptors presented are considered appropriate.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded	Embedded mitigation measures, designed	BMSDC provided the following position in their	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
	mitigation	as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality** ~~rAPP-147Revision~~ B]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Relevant Representations dated 27 November 2025: The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality** ~~rAPP-147Revision~~ B and set out in **7.2 Outline Code of Construction Practice** ~~rREP4-164Revision~~ G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	Agreed
3.4.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality** ~~rAPP-147Revision~~ B], Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			the Applicant.	
EIA - Assessment Conclusions				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147Revision B],** The assessment of effects during construction presented is considered appropriate.	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: e The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	Agreed
3.4.11	Operational (and maintenance) effects	TheAn assessment of effects ~~during operation~~ (operational and maintenance) is presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - ~~Air Quality [APR-147],~~** ~~The assessment of~~ effects ~~during operation (and maintenance)~~ presented is considered appropriate, effects was screened out in ~~the 6.19 EIA Scoping Report [APP-296] and was agreed within the 6.20 Scoping,~~ Opinion [APP-297].	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	**7.2 Outline Code of Construction Practice ~~[REP4-164REP4-164Revision~~ G** includes all relevant mitigation	Statutory Consultation response stated: 'Whilst dust control is addressed, we recommend the CoCP specifies the means of water suppression to be used	Agreed

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		measures specified in **6.7 Environmental Statement Chapter 7 - Air Quality** ~~rAPP-147Revision~~ B] and is appropriate for managing construction impacts from the Project.	and how this supply will be maintained particularly during periods of dry and windy weather. The supply shall be suitable and sufficient having regard to the size of the area under development.' Comments received on 25 February raised the following summarised points: • Reviews to the dust management plan in relation to compounds • The use of satellite locations to understand areas that generate dust. BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by the Applicant.	
~~Other matters as required~~				

3.5 Noise and Vibration

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context** ~~rAPP-126Revision~~ **B]** and Section 14.2 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** **rARR-256Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. Significant effects are defined in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** ~~rAPP-256Revision~~ **B]** and are based on applicable guidance. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • Definition of "significant" noise to be clarified. • BMSDC EP Comments 01/05/26 - We would ask that this remains under discussion to ensure that we have had sight of this document and the additional details provided. ♦-BMSDC confirmed agreement of this matter via email on 2nd July 2026.	~~Under discussion~~Agreed
EIA - Approach and Methods				
3.5.2	Study area	The study area was agreed through ~~the~~ **BIA-6.19 Scoping Report [APP-288]- to {APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been	BMSDC noted in their Relevant Representations that	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		collected to inform the assessment as presented within Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** ~~rAPP-256~~**Revision fil-**	this matter is agreed,	
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through ~~the EIA~~ **6.19 Scoping Report [APP-288]-to {APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** ~~rAPP-256Revision~~ **BJ.** The key parameters and assumptions presented are considered appropriate. The following information is in response to comments raised in November 2025: Significant effects are defined in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** ~~[APP-256Revision~~ **B]** and are based on applicable guidance. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	BMSDC provided the following comments in their Relevant Representation dated 27 November 2025: • ~~Not agreed, as per comments on 3.5.1.~~BMSDC confirmed agreement of this matter via email on 2nd July 2026.	~~Under discussion~~Agreed
EIA - Baseline Conditions				
3.5.6	Baseline	The baseline conditions and receptors for	BMSDC provided the following comments in their	~~Under~~

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
	conditions and receptors	Noise and Vibration are presented in Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [ARR-256Revision B].** The baseline conditions and receptors presented are considered appropriate. This matter was discussed with BMSDC during a topic specific meeting in December 2025. The approach to the assessment was discussed together with the identification of receptors and baseline conditions. All receptor locations are provided in the ~~**ES Figure**~~ **6.14.F1 Environmental Statement Figure 14.1 - Baseline Noise Data [APP-262].** Update May 2026 - Receptor locations are shown in ~~**ES Figure**~~ **6.14.F1 Environmental Statement Figure 14.1 - Baseline Noise Data [APP-262].** Construction noise and vibration assessment results are shown in **6.14.F2 Environmental Statement Figure 14.2 - Construction Noise Assessment Outputs [APP-263]** and **6.14.F3 Environmental Statement Figure 14.3 - Construction Vibration Assessment Outputs [APP-264],** respectively. The baseline for the construction noise assessment takes account of the low ambient noise levels in a rural area and uses the lower Category 'A' threshold for the 'ABC' method described in BS	Relevant Representation dated 27 November 2025: ~~• Not agreed as all receptor~~ locations ~~have not been supplied.~~ • BMSDC EP Comments 01/05/26 - It should be confirmed if an updated plan has been provided to detail all of the receptors and monitoring positions. • BMSDC confirmed agreement of this matter via email on 2nd July 2026.	~~discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		5228-1.		
EIA- Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Noise and Vibration effects, are set out in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration fARP-256Revision BI** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan ~~[APP-306Revision~~ DI** has been prepared based on a worst-case assessment. The NVMP will be further developed by the Main Works Contractor(s) once the detailed design is available. With regards to the specific points raised by BMSDC: • With regards to monitoring, this would be managed and undertaken by the contractor through consultation with the local authority where appropriate. In some cases monitoring may form part of the requirements for a Section 61 agreement • With regards to piling, the assessment assumed a worst-case percussive	The Noise and Vibration Management Plan should include: e Proposed noise/vibration limits and justification for limits proposed ..... * Details of how monitoring will be undertaken, monitoring positions, frequency and duration with llow access W0L|ld be provided via a web-based s y,stem of monitoring the above parameters in real tlme - • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: _ /\ noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound _ The assessments are to be undertaken in accordance with British Standard 4142 and	Agreed

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		method may be used. Alternative methods will be used where practicable. This will be determined by the contractor following their detailed assessments, including assessment of ground conditions. No locations have been identified where there are likely significant adverse effects from noise and vibration from percussive piling where appropriate mitigation is incorporated in the works. Alternative methods, where appropriate would be expected to be quieter. • Noise and vibration from compounds would be assessed by the contractor, and specific mitigation measures would be identified and incorporated into the NVMP. This would include both the construction and operation of the compounds during the construction phase. The initial assessment presented in the ES did not identify any likely significant adverse effects from noise or vibration from either the construction or operation of construction compounds. • BS 4142 is not strictly appropriate for the assessment of noise from construction compounds, with BS 5228 taking precedence. However, the principles of BS 4142 may be incorporated into the assessment	British Standard 5228 (or any subsequent revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track. • BMSDC EP Comments 01/05/26 - Provided that the applicant is in agreement with the requirements outlined above and this is confirmed, 3:5:7 - 3:5:11 can be moved to agreed.	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		conducted by the contractor, particular for any fixed plant items. • The assessment would include all noise sensitive receptors within the study area, with the results compared against appropriate thresholds. BPM mitigation would be incorporated into all works, not just those expected to exceed the SOAEL without mitigation, to avoid significant adverse effects minimise adverse effects. • The assessment would include the construction and use of access tracks and haul roads, with mitigation incorporated where appropriate to avoid significant adverse effects minimise adverse effects.		
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** ~~rAPP-256Revision~~ **B]** and set out in **7.2 Outline Code of Construction Practice** ~~rREP4-164Revision~~ **G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Please see responses to ID3.5.7 above in response to the duplicate comments.	The Noise and Vibration Management Plan should include: • Proposed noise/vibration limits and justification for limits proposed • Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time. • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: - A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound - The assessments are to be undertaken in accordance **with British Standard 4142** and **British Standard 5228** (or any subsequent revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			access track.	
3.5.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [ARR-25GRevision B].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Please see responses to ID3.5.7 above in response to the duplicate comments.	The Noise and Vibration Management plan should include: • Proposed noise/vibration limits and justification for limits proposed • Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time. • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: - A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound - The assessments are to be undertaken in accordance **with British Standard 4142** and **British Standard 5228** (or any subsequent	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.	
EIA - Assessment Conclusions				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 14.7 of **6.14 Environmental Staternent ChaP 14 - Noise and Vibration ~~rAPP-256Revision~~ B].** The assessment of effects during construction presented is considered appropriate. Please see responses to ID3.5.7 above in response to the duplicate comments.	The Noise and Vibration Management plan should include: e Proposed noise/vibration limits and justification for limits proposed * Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would provided via a web-based system of monitoring the above parameters in real time. • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: - A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound - The assessments are to be undertaken in accordance **with British Standard 4142** and **British Standard 5228** (or any subsequent revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each	

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			access track.	
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration** **FARR-256Revision BI.** The assessment of effects during operation (and maintenance) presented is considered appropriate. Please see responses to ID3.5.7 above in response to the duplicate comments.	The Noise and Vibration Management plan should include: • Proposed noise/vibration limits and justification for limits proposed • Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time. • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: - A noise impact assessment (NIA) and vibration impact assessment (VIA) for each proposed compound - The assessments are to be undertaken in accordance **with British Standard 4142** and **British Standard 5228** (or any subsequent	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
			revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3 423, 5.12a	Outline CoCP (Matters other than working hours)	**7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant mitigation measures specified in **6.14 Environmental Statement Chapter 14 - Noise and Vibration ~~rAPP-256Revision~~ B]** and is appropriate for managing construction impacts from the Project. ~~A meeting was held in October 2024 to agree on the structure for the **7.2 Outline Code of Construction Practice [APP-300].** A further meeting was held in January 2025 to address comments from stakeholders.~~	~~Comments received from BMSDC on 25 February raised the following summarised points:~~ ~~• Amendments to the construction hours as to not affect nearby amenities.~~ ~~• Amendments to the construction hours as to not affect nearby amenities.~~ • Inclusion ~~of noise/vibration~~ limits, ~~detailed monitoring requirements, and noise and vibration monitoring~~ in ~~relation to compound areas.~~ ~~CONSTRUCTION HOURS~~ ~~• We would ask that the construction hours (including vehicle movements on site) are restricted as follows:~~	~~Not agreed~~Agree 4

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		~~A meeting was held~~ in ~~March 2025 to discuss the second~~ iteration ~~of the **7.2 Outline Code of Construction Practice [APP-300].**~~ ~~A further~~ iteration ~~of the **7.2 Outline Code of Construction Practice [APP-300]** was~~ issued in ~~May 2025 following the meeting and feedback~~ in ~~writing.~~ ~~Construction Hours:~~ ~~The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft DCO [REP3-004].**~~ ~~The construct)n works are~~ largely I ~~near and would not occur along the~~ entire length ~~of the project for the full duration of the construction programme. Rather there would be periods of higher and~~ lower intensity ~~working~~ in each ~~specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific~~ locations ~~within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place~~ every ~~weekend or bank holiday.~~ ~~The defined core working hours provides essential flexibility.~~ Importantly, ~~the core working hours permit, but do not require,~~	~~- 07.30 – 18.00hrs Mondays to Fridays~~ ~~- 08.00 – 13.00hrs Saturdays~~ ~~- No working and/or plant operated on Sundays and Bank Hol days.~~ • Scheduled overruns/out of hours working are subject to COPA1974 S61 prior consent with the submission of an application detailing times of work, plant details and noise/vibration levels at least 28 days prior to commencement. This would be essential in the case of horizontal directional drilling (HDD) which is identified as being likely to require night time working to complete trenchless crossings • Where noise levels have been agreed with the LPA for a COPA1974 S.61 prior consent, this will provide a defence to the person undertaking the construction activities providing they remain within those levels with no exceedances. However, where levels are exceeded then Statutory Nuisance may exist under the EPA1990 S.79. The LA may take action under S.80. • It should be noted that an individual aggrieved may still take action under the EPA1990 S.82 or seeking an injunction. • Control and mitigation measures in respect of noise, vibration, dust and light are in place to reduce the likelihood of a Statutory Nuisance however they may not completely exclude the possibility of action being taken under the provisions of the Environmental Protection Act	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		~~working on Sundays and Bank Holidays. This flexibility~~ is ~~critical to maintaining programme resilience, allowing the~~ pfc set ~~to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints.~~ ~~Maintaining programme resilience is also necessary to accommodate~~ interface ~~dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and~~ enable ~~safe and~~ efficient ~~sequencing of works where~~ extended ~~stoppages would be~~ impractical ~~or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid~~ extended impacts ~~on communities, traffic networks,~~ landholdings, ~~and the~~ environment. ~~A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility,~~ increasing ~~the risk of programme slippage,~~ inefficient ~~stop-start working, and a~~ longer ~~overall construction period, which would~~ itself ~~result~~ in ~~greater~~ long-term exposure ~~to construction~~	1990. • We would not consider the agreement to these by the Local Planning Authority to be a reasonable and proportionate defence against future nuisance action. NOISE AND VIBRATION MANAGEMENT The Noise and Vibration Management plan should include: • Proposed noise/vibration limits and justification for limits proposed • Details of how monitoring will be undertaken, monitoring positions, frequency and duration with how access would be provided via a web-based system of monitoring the above parameters in real time. • The documentation states that use of percussive piling methods is to be avoided. If piling is required, other methods should be used and a specific noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions). • Specific attention should be made within the assessment to Compounds and any areas of remote work where portable machinery or equipment may be used i.e. generators or suchlike. • Having regard to the length of time for which compounds may remain in situ and use, the following is required: - A noise impact assessment (NIA) and	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		impacts ~~than occasional controlled working hours, then a request which would also undermine the deliverability of this critical national priority project, where timely delivery~~ is in ~~the public~~ interest. **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 draft DCO ~~rREP3-004Revision~~ G]** within the final CoCP. ~~The Applicant would also~~ like ~~to note that reducing working hours on a Saturday to 8:00-13:00 would not be practical as~~ it ~~would significantly~~ limit ~~the available time to carry out construction activities. The process of mobilising the workforce, setting up~~ equipment ~~and preparing the site for work can take a considerable amount of time at the start of~~ each ~~shift,~~ likewise ~~with demobilisation which requires adequate time to safely secure~~ equipment ~~and materials to~~ ensure ~~the site~~ is left in ~~a safe condition. A substantial portion of the morning would~~	vibration impact assessment (VIA) for each proposed compound - The assessments are to be undertaken in accordance **with British Standard 4142** and **British Standard 5228** (or any subsequent revisions). - A list of all noise sensitive receptors marked on a plan together with the predicted noise/vibration impact and specific noise/vibration mitigation measures proposed. - Figures to be provided for the LOAEL levels as well as the SOAEL levels for noise and vibration. - Include an assessment of noise and vibrations relating to and mitigation proposed relating to the construction of compound itself. - Include an assessment of noise and vibration associated with and mitigation proposed in respect of the creation of and use of each access track. ~~**BMSDC EP comments 01/05/26—We** would reiterate our previous position as follows ask that this section remains **under discussion.**~~	

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		be taken up by these activities, leaving insufficient time for productive construction works. There are a number of instances within Requirement 7 of Schedule 3 of **3.1 draft DCQ [REP3-004]** that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, the Applicant, does not consider it to be practical to notify the relevant authorities. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [REP4-164],** including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GGQ1), applications for prior consent under Section 61 of the Control of Pollution Act 197d (NVQ3) and advance community notification (GG30). Please see responses to ID3.5.7 above in response to the duplicate comments on noise. Update May/July 2026: Further detailed construction noise and		

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		vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice ~~rREP4-165]Revision~~ G]** and submitted to BMSDC prior to the start of works. The detailed assessment will take account of specific works locations within the LoD, specific working methods and plant, and working periods and durations. Best practicable means (BPM) are secured by NV01 of **7.2 Code of Construction Practice ~~rREP4-165Revision~~ G]** and specific mitigation measures, restrictions, monitoring and reporting protocols will be submitted to BMSDC for approval prior to the start of works under Requirement 4 of **3.1 Draft DCO [Revision G],** ~~With regards to~~ evening, ~~weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be~~ exceeded ~~for specific works~~, including ~~mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05For~~ certain activities, Section 61 applications for prior consent may be appropriate, through consultation with		

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		DMSDC. These are secured by commitment NV03 of **7.2 Code of Construction Practice ~~rREP4-165l)Revision~~ G].** These would, in additional to NV05 and the NVMP, secure mitigation, temporal restrictions ~~may be put~~ in ~~place at specific~~ locations ~~for specific works to~~ ensure ~~significant adverse~~ **effects** ~~do not to occur. Such temporal restrictions would form part of BPM measures to control noise~~ impacts, ~~as secured by NVQ1 of **7.2 Code of Construction Practice [REP4-165].**~~ monitoring and reporting proposals for specific activities. At Deadline 4, Commitment NV23 has been updated to clarify the position on percussive piling, stating: *"For the construction of pylon foundations, non-percussive piling methods will be used, except where the results of ground investigations reveal that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing."*		
~~**Other matters as required**~~				

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
3.5.12b	Outline CoCP (Working hours)	Construction Hours: The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft DCO [Revision G],** The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints.	Comments received from BMSDC on 25 February raised the following summarised points: • Amendments to the construction hours as to not affect nearby amenities. • Inclusion of noise/vibration limits, detailed monitoring requirements, and noise and vibration monitoring in relation to compound areas. CONSTRUCTION HOURS • We would ask that the construction hours (including vehicle movements on site) are restricted as follows: – 07.30 - 18.00hrs Mondays to Fridays - 08.00 - 13.00hrs Saturdays - No working and/or plant operated on Sundays and Bank Holidays. **BMSDC EP comments 01/05/26** - We would reiterate our previous position as follows ask that this section remains **under discussion.**	Not agreed

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		Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. The Applicant would also like to note that reducing working hours on a Saturday to 8:00-13:00 would not be practical as it would significantly limit the available time		

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		to carry out construction activities. The process of mobilising the workforce, setting up equipment and preparing the site for work can take a considerable amount of time at the start of each shift, likewise with demobilisation which requires adequate time to safely secure equipment and materials to ensure the site is left in a safe condition. A substantial portion of the morning would be taken up by these activities, leaving insufficient time for productive construction works. With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NVQ5 of **7.2 Code of Construction Practice [Revision G]),** temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NVQ1 of **7.2 Code of Construction Practice [Revision G]** and would be agreed with		

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ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		BMSDC prior to the start of works under Requirement 4 of **3.1 Draft DCO [Revision G].** There are a number of instances within Requirement 7 of Schedule 3 of **3.1 draft DCO [Revision G]** that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, the Applicant does not consider it to be practical to notify the relevant authorities. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G],** including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQQ1), lighting (GG26), monitoring and compliance (GG09, GGQ1), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NVQ3) and advance community notification (GG30). The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

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3.6 Health and Wellbeing

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context ~~rAPP-126Revision~~ B]** and Section 10.2 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing FARR-492Revision Cl.** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
EIA - Approach and Methods				
3.6.2	Study area	The study area was agreed through the- **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and**	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Wellbeing ~~rAPP-192Revision~~ C],		
3.6.4	Assessment methodology	This is noted.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing |APP-1~~92Revision~~ £]**. The key parameters and assumptions presented are considered appropriate.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
EIA - Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 **6.10 Environmental Statement Chapter 10 - Health and Wellbeing rARR-432Revision C].** The baseline conditions and receptors presented are considered appropriate. The Health and Wellbeing assessment is presented in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [ARP-4S2Revision C].** The Health and Wellbeing assessment has focused on the local population. Aspects that may affect tourists specifically include impacts relating to physical activity and access to open space which have also been assessed in **6.10 ~~6.10~~ Environmental Statement Chapter 10 - Health and Wellbeing ~~fARP-192Revision~~**	BMSDC provided the following position in their relevant representations dated 27 November 2025: • The baseline for Health and Wellbeing has not included the impact of the project on our non-resident population (including tourists) or specific indicators of deprivation including access to services or affordability which are particularly poor in Babergh district.	~~Under discussion~~No ~~* applicable~~

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		£|. Impacts on tourism and tourist facilities are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism** ~~**rAPP-265Revision**~~ **C],** The Health and Wellbeing assessment in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing** ~~**rAPP-192Revision**~~ **C]** has been informed by baseline data including the Index of Multiple Deprivation (IMD). The IMD comprises multiple deprivation domains, which include barriers to housing/services and income. BMSDC advised in June 2026 that they defer to Suffolk County Council (SCC) on this matter. This matter is therefore considered 'Not Applicable.		
EIA- Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing rARP-432Revision C].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
3.6.8	Standard	Standard mitigation measures to reduce	Matters relating to Health and Wellbeing will be	Not

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
	mitigation	potential effects during construction are summarised in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing** ~~rAPP-192Revision~~ C and set out in **7.2 Outline Code of Construction Practice** ~~rREP4-164Revision~~ G], The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	responded to by Suffolk County Council.	applicable
3.6.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing** **[APP-492Revision C].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable
EIA - Assessment Conclusions				
3.6.10	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing** ~~[APP-192Revision~~ **C].** The assessment of effects during construction presented is considered appropriate. Whilst it is noted that the Council do not accept the conclusions in relation to the health and wellbeing assessment, the Applicant considers that the assessment has been undertaken in line with appropriate guidance agreed with local	BMSDC provided the following position in their relevant representations dated 27 November 2025: • The conclusion that effects would be not significant in relation to health and wellbeing is not accepted.	~~Under-discussion~~No ~~* applicable~~

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		authorities (e.g. IEMA and WHIASU) and is a robust and proportionate assessment for a scheme of this nature, informed by best practice and professional judgment. BMSDC advised in June 2026 that they defer to SCC on this matter. ~~The Applicant considers~~ it is ~~unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.~~		
3.6.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing FARR-4S2Revision CI.** The assessment of effects during operation (and maintenance) presented is considered appropriate. BMSDC advised in June 2026 that they defer to SCC on this matter. This matter is therefore considered 'Not Applicable.	BMSDC has not confirmed their position on this matter.	~~Under discussion~~Not applicable
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	**7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing ~~rAPP-192Revision~~ C]** and is appropriate for managing construction impacts from the Project. ~~A meeting was held in October 2024 to agree on the structure for~~	Matters relating to Health and Wellbeing will be responded to by Suffolk County Council.	Not applicable

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		the **7.2 Outline Code of Construction Practice [APP-300]** A n'-rther-meeting was held in January 2025 to address comments from stakeholders. Meeting held in March 2025 to discuss the sece-nd-iteration of the **7.2 Outline Code of Construction-Practice [APP-300],** A further i-ter-at-ioA-of the **7.2 Outline Code ef-GonstH4ctinn-RraGtiGe-[APR-340]-was-** issued in May 2025 following the meeting and feedback in writing.		
Other matters as required				
3.6.13	EMF assessments	**7.&- Electric and Magnetic Field Compliance Report [REP3-034]** details the electromagnetic field (EMF) assessment for the Project, demonstrating compliance with the requirements of National Policy Statement (NPS) EN-5 in line with the requirements of the Governments Code of Practice 'Power lines: Demonstrating compliance with EMF public exposure guidelines'. This demonstrates that when directly under the overhead lines or directly above the underground cables the ICNIRP exposure limits are not exceeded. Any offset from the overhead line or cables reduced the EMF levels significantly ensuring compliance at any distance from the assets. No residential properties are located	BMSDC provided the following position in their Relevant Representations dated 27 November 2025: • A site-specific risk assessment calculating the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels has not been submitted. This information is necessary to appropriately assess the potential for exposure to electromagnetic radiation against the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and RF EMF Guidelines 2020 limits. The levels must be when all equipment, both existing and proposed, are operating at maximum power. A valid ICNIRP certificate must also be submitted. • The EMF emissions should not exceed limits within the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2023), including set the ICNIRP guidelines (or any subsequent	Not agreed

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		closer than 30 metres to the overhead line over the entire Project. At this distance, the electric and magnetic fields on the second floor of a property (3.5 metres above ground) would be 0.55 kV/m and 10.94 pT using the maximum continuous operation conditions. These are significantly below the ICNIRP exposure limits detailed in NPS EN-5. All other EMFs in residential properties along the overhead line route would be less than these values due to the additional distance. For underground cables, increasing the vertical distance reduces the EMFs further, so the details noted in Chapter 6, Section 6.3 of **7.8 Electric and Magnetic Field Report [REP3-034]** represent a worst case exposure situation and compliance. The Applicant does not agree that a further site-specific assessment of individual residential properties is necessary. **7.8 Electric and Magnetic Field Report [REP3-034]** is the Applicant's formal submission of compliance with the ICNIRP limits and can be used as evidence of compliance for the entire Project. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not	updates) and any alterations should be approved in writing in advance by the relevant authority.	

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Agreed.		

3.7 Historic Environment

3.7.1 Babergh and Mid Suffolk District Councils defer all positions regarding archaeology to Suffolk County Council, therefore Table 3.7 below only deals with Built Heritage.

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context |APP-1~~26Revision~~ B** and Section 11.2 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-QeSRevision D].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant notes the BMSDC request for further clarity in relation to non-designated heritage assets. All	[Built Heritage] Query raised with National Grid regarding Paragraph 11.4.25 on page 26 of Document 6.11 Environmental Statement Chapter 11 - Historic Environment - that the settings of all Low value non-designated heritage assets (which include locally listed buildings) have not been assessed which would not appear to be in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1). Based on a further review of the identification and assessment of the value of NDHA buildings in Document: **6.11.A1 Appendix 11.1 Historic Environment Baseline Report [APP-209]** we are able to agree this matter.	Agreed

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		non-designated heritage assets were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 - APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in Environmental Statement **6.11 Environmental Statement Chapter 11 - Historic Environment ~~rAS-068Revision~~ D].** Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Project therefore		

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.		
EIA - Approach and Methods				
3.7.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	Agreed
3.7.3	Data sources (Built heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment ~~rAS-068Revision~~ D].** Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. **6.11.A1 Environmental Statement**	No clear distinction has been made between built NDHAs and archaeological (below ground) NDHAs in the assessment tables. There are some references to non-designated buildings in the Baseline Report but these have not been given a reference/ID number and none appear to have been taken forward to the assessment tables (presumably as they are held to be of Low Value/Sensitivity). Clarification regarding the identification on non-designated built heritage assets and the assessment (or not) of impacts on their significance arising from the development should be provided. BMSDC (Built Heritage) confirm matter is agreed.	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Appendix 11.1 - Historic Environment Baseline Report Figure A11.1.2 - Non-Designated Heritage Assets [REP4-124] is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.		
3.7.4	Assessment methodology (Built heritage)	The methodology for assessing Historic Environment was agreed through the **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The Scoping Opinion stated: *"The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities."* The assessment methodology has	The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BMSDC raised at statutory consultation that they did not agree with the value assigned to heritage assets. This related to the Value/Sensitivity assigned to Grade II listed buildings in the assessment methodology. The assignment of a Medium value to these assets is now accepted. BMSDC stated that they were in agreement that decommissioning effects could be scoped out. This is considered acceptable subject to the provision of a guarantee within the DCO that decommissioning of the project will require appropriate assessment. Email from Suffolk County Council 4th Nov 2024 - Built	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BMSDC raised at statutory consultation that they did not agree with the value assigned to heritage assets. However, there is precedent for the approach proposed and professional judgement is always used when assigning value to heritage assets. Therefore, as per the Scoping Opinion report, the value assigned to heritage assets will remain the same. It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion. The Applicant position regarding non-designated heritage assets is as outlined in ID3.6.1 (Policy and Legislation) above.	heritage - consultant's methodology not agreed, and all assets affected not identified. The value assigned to all heritage assets in Table 11.3 of Document 6.11 Environmental Statement Chapter 11 - Historic Environment is agreed. Historic Environment Viewpoints feedback received on 3rd March 2025 from EPS on behalf of BMSDC. • It appears that the only NDHAs included in Annex A are those that appear on the relevant Historic Environment Record. This is concerning as not all built NDHAs will be included on the HER. Unfortunately, no text has been provided which addresses various comments and questions previously raised regarding whether there was a methodology for identifying NDHAs as part of site walkovers, whether this has been undertaken, or whether any have been identified. • As such, there are still concerns that not all NDHAs have been included (EPS on behalf of BMSDC - Built Heritage, June 2025). Please see latest comments above. • A 'spot check' of the Draft Heritage Baseline Report was carried out by EPS on behalf of BMSDC which raised questions and concerns regarding the robustness of the methodology. These comments were submitted to NG in a letter dated 6th March 2025 (EPS on behalf of BMSDC - Built Heritage, June 2025 BMSDC confirm this matter is now agreed following review of the ES.	
3.7.5	Key parameters and assumptions (Built heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 **6.11 Environmental Statement Chapter 11 - Historic Environment**	Please see comments regarding non-designated buildings (NDHAs) above at ID3.7.3. ECC (Built Heritage) is in agreement with the matter following review of the ES.	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		~~rAS-068Revision~~ D]. The key parameters and assumptions presented are considered appropriate. In March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.		
EIA - Baseline Conditions				
3.7.6	Baseline conditions and receptors (Built heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment** ~~rAS-068Revision~~ D]. The baseline conditions and receptors presented are considered appropriate.	A spot check of the Baseline report suggests it is mostly considered appropriate subject to clarification regarding built NDHAs. BMSDC (Built Heritage) confirm matter is now agreed.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment** ~~[AS-068Revision~~ D]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **5.15 Design Development Report [APP-122]** provides an explanation of	The embedded and mitigation measures are acceptable in principle, however, the residual effects of the proposals at both Construction and Operation and Management phases of the project include a Mid level of less than substantial harm to the significance of some designated heritage assets. Following our review and assessment of NG's conclusions on the impacts of the project on heritage assets, for each designated heritage asset where a Mid Level of less than substantial harm has been identified to its significance at the Operation and Maintenance phase of the project we would request further details are provided by the Applicant regarding the embedded mitigation measures that have been employed, for example, the selected overhead line routes	~~Under-discussion~~Agreed

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		the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted consultations held in 2025. **5.15 Design Development Report [APP-122]** addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The Applicant provided further detail on embedded, standard and additional mitigation for designated heritage assets in response to ExQ1 HE 1.36 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	and pylon locations and whether or what, if any, alternatives were assessed prior to the submitted project design. Further time is needed to review **5.15 Design Development Report [APP-122]** but we note this refers only to changes requested to the route alignment which were made before the final ES. BMSDC advised that this matter can be considered agreed following a call held on 23.6.2026.	
3.7.8a	Standard mitigation (Built	Standard mitigation measures to reduce potential effects during	We recommend that standard mitigation measure H06 is further expanded to clarify the definitions of 'appropriate'	Agreed

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	heritage)	construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment** ~~rAS-068Revision~~ D] and set out in **7.2 Outline Code of Construction Practice** ~~rREP4-164Revision~~ G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management Plan** ~~rREP3-030Revision~~ G]. Specifically, this means: Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature. Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant,	replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals offences, walls, etc. We also recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects. Update to comments 1/5/26: Regarding H06, the applicant's explanation of 'appropriate' in this context is acceptable, however, Section 9 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** makes no specific reference to the historic environment or reference to historic environment records. The commitment set out here by the applicant in the SoCG (highlighted yellow opposite) should be captured in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** or another suitable document, with specific reference to heritage assets.	

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		consultation with Local Planning Authorities and heritage specialists. Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible. If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced. The Applicant has updated **7.4 Outline Landscape and Ecological Management Plan** ~~**rREP3-030REP5-157]**~~ at Deadline 5 to contain the text above. Also note section 9.8 of **7.4 Outline Landscape and Ecological Management Plan** ~~**rREP3-030Revision**~~ **G]** specifically covers reinstatement of protected lanes, which are assessed as heritage assets. Sections 7 and 9 also refer to historic hedgerows. The Applicant considers that with this update this matter can be moved to Agreed. ~~**[REP4-164]**~~		
3.7.8b	Standard mitigation (Built	Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and**	Subject to the prior agreement, with the LPA, of the strategy for engagement with building owners, the reporting of issues	Under discussion

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	heritage) - Commitment H07	**Vibration fARP-25GRevision B]** did not identify any heritage assets in BMSDC that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 of **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** is considered to be appropriate. Commitment NV04 works in conjunction with commitment NVQ5, NV01, and NV03 that require the Main Works contractor to prepare detailed construction vibration (and noise) assessments based on the their proposed proposed methodologies, and specify mitigation measures and monitoring proposals for submission for agreement to the relevant local planning authority. These measures are equally applicable to potential effects of vibration on buildings and structures. Additionally, where the contractors' assessments identify potential significant effects (which would include potential risk of building damage), such works would be subject to Section 61 applications through consultation with the relevant	relating to vibration damage by building owners, the resolution of issues arising and the recording of actions, this matter is agreed BMSDC consider these amendments appropriate to largely address the concerns previously raised in relation to monitoring and enforcement mechanisms for noise and vibration impacts. ~~Regarding H07, whilst we understand the calculated potential for adverse~~ effects ~~from construction vibration~~ extends ~~only to the~~ listed ~~Little Bromley War Memorial, we remain of the view that there should be a mechanism for reporting and~~ investigating ~~any concerns about the~~ impact ~~of construction~~ effects ~~by building owners and residents.Under~~ discussion pending approval from BMSDC technical specialist.	

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		local planning authority. As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information** ~~rREP'1-168Revision~~ **C]** a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. In addition, **7.2 Outline Code of Construction Practice** ~~**rREP4-164Revision**~~ **G],** commitment GG30 includes: "A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken." The Applicant considers that ~~through ongoing~~ engagement ~~between the~~		

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		~~nnrtiriC', thlO matter ccn ho mnl/orl, to psiml LicX-> LI ni8 IIidLLLxl wd I1 kJL-r IIiLJvLzLJ LO /Arimolk anricc8!~~		
3.7.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment ~~rAS-068Revision~~ D].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Given the response from the Council the Applicant considers that this matter can be moved to Agreed.	We understand that no additional mitigation is proposed. It is agreed that in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest. EPS on behalf of BMSDC noted during call in January 2026 that this matter is not relevant for Built Heritage.	Not applicable
EIA-. Assessment Conclusions				
3.7.10	Construction effects (Built heritage)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment ~~[AS-068Revision~~ D].** The assessment of effects during construction presented is considered appropriate.	Email 4 Nov 2024 - Archaeology - consultants not assessing significant areas of 132kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. BMSDC (Built Heritage) confirm that this matter is agreed.	Agreed
3.7.11	Operational (and maintenance) effects (Built heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment ~~rAS-068Revision D]~~**. Thp assessment of effects during operation (and maintenance) presented is considered appropriate.	For Section B, based on a desk based review of the NG assessments for the Scheduled Monument, the Conservation Areas and the Grade I and Grade II* listed buildings and some nearby Grade II listed buildings, the assessments of harm to significance are mostly agreed. Grade II listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806) are located on the northern edge of the Meilis Conservation Area and as such we would disagree with the assessment of no harm to	~~Under-discussion~~Agreed

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		Regarding Hall Farm House (1181726) and Barn About 30 m West of Hall Farm House (1032806) - At their nearest, pylons would be c. 900 m north-west of the assets. Between pylon RG108 (1.5 km west-south-west of the assets) and pylon RG102 (1 km north of the assets), the Project would replace an existing run of smaller pylons (PKF16—24). At a distance of almost 1 km the assessment concluded that the slight difference in height would not be noticeable. Also, the greater span of the new pylons means that two fewer pylons would be required, reducing impact further. The Project, therefore, considers the assessment of harm as presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets** ~~rAPP-215Revision~~ **B]** for these assets to be appropriate. The Applicant submitted Limit of Deviation (LoD) visualisations at Deadline 5 in response to ISH2 Action Point 25, in **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations [REP5-195 to REP5-198],** with justification for the visualisations prepared detailed in	their significance during the Operational phase of the project. We would suggest there will be a Low level of less than substantial harm to the significance of these buildings due to the change to their setting, in line with the effects on the Conservation Area. In Section C, based on a desk-based review of the NG assessments for the Scheduled Monument, the Conservation Area, the Grade I and Grade II* listed buildings and some nearby Grade II listed buildings, the assessments of harm to significance are agreed. Update 1/5/26: This topic remains under discussion in light of questions raised by IPs and the ExA which were discussed at ISH 2 Landscape and Heritage on Wednesday 29 April 2026 regarding the Limits of Deviation (LoD) in the DCO, and the action arising to agree further viewpoint visualisations to demonstrate the potential impacts of the LoD on the setting of designated heritage assets. Further consideration will be given to the applicant's response regarding their assessments of impact for Grade II listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806). **June 2026 update:** With regards to Grade **II** listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806) BMSDC are happy to agree the applicant's assessment based on the additional information provided. BMSDC intend to respond to the visualisations submitted in response to ISH2 **[REP5-195 to REP5-198]** at Deadline 6. This matter is considered to be agreed.	

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		8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194], The Applicant has reviewed the additional LoD visualisations prepared for this Action Point and confirms that the judgements in Section 11.9 Sensitivity Testing of 6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D] remain fair and reasonable. The Applicant is ~~preparing the reguested visualisations for Deadline 5 and has~~also provided further information at Deadline 4 about the assessment of the LoD in 8.17 Response to Rule 17 Letter - Historic Environment [REP4-318] and 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]. The Applicant will ~~provideprovided~~ responses to ExQ2 (in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211]) and Deadline 4 submission from Interested Parties (in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4[REP5-192]) at Deadline 5.		

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		The operation of the LoDs is controlled through the DCO: • Article 3(8) requires NGET to construct the authorised development (i.e. as the Works are described in Schedulel) in accordance with works plans, subject to the limits of deviation and the Requirements. • Works Plans - The works plans show the lines and situations, including horizontal LoD for specific works, including the pylons and overhead lines. The tables of parameters at the back of each section of Works Plans sets out the height of the infrastructure including pylon heights and the vertical upwards LoD. • Article 5 (LoD) sets out the maximum LoD for different elements of the authorised development - vertical and horizontal. • Requirement 4 - there are some Works, e.g. individual pylons, for which the LoD is restricted in **7.2 Outline Code of Construction Practice [Revision G]** commitment GG34 for mitigation purposes (secured by		

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		Requirement 4) • Requirement 6 - part (2) "The authorised development will not be in general accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects from those identified in the environmental statement." The ES has assessed the alignment shown in the Works Plans and has also undertaken a sensitivity test for the LoDs. The LoDs have therefore been assessed as reported in the ES. The approach adopted for LoDs in the Project as outlined above is consistent with other National Grid DCOs that have been approved and we believe consistent with many other DCOs. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP	Z 47.2 **Outline Code of Construction Practice** ~~rREP4-164Revision~~ **G]** includes all relevant construction mitigation	In document **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** NG have identified the potential for damage to a total of five buildings or structures due to construction vibration from potential compaction	Agreed

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		measures specified in **6.11 Environmental Statement Chapter 11 - Historic Environment** ~~**[AS-068Revision**~~ DJ and is appropriate for managing construction impacts from the Project. ~~A meeting was held~~ in ~~October 2024 to agree on the structure for the Outline CoCP~~ ~~**[APP-300],**~~ ~~A further meeting was held~~ in ~~January 2025 to address comments from stakeholders.~~ ~~A meeting was held~~ in ~~March 2025 to discuss the second~~ iteration ~~of the Outline CoCP~~ ~~**[APP-300].**~~ ~~A further~~ iteration ~~of the Outline CoCP~~ ~~**[APP-300]**~~ ~~was~~ ssued in ~~May 2025 following the meeting and feedback~~ in ~~writing.~~ The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	activities. Four of these are located in Section C but none of which are in Babergh District. No structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.	
~~**Other matters as required**~~				

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3.8 Landscape and Visual

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment (LVIA) is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context ~~rAPP-126Revision~~ B]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APR-226Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The ~~ApDlicantApplicant's~~ approach to the duty to seek to further the purposes of the National Landscape is set out in **5.10 National Landscapes - Duty to Seek to Further the Purpose Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** which includes reference to and consideration of the Defra guidance note. The Applicant has responded on landscape compensation under ID 3.8.9a.	Reference is also needed to the DEFRA guidance note (2024) in relation to the enhanced duty for National Landscapes under LURA (2023). Likely material. https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes, Add reference to Overarching National Policy Statement for Energy (EN-1) Para 4.3.4 in relation to compensation for significant negative impacts '*To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy':* Still no specific reference to these in policy section of LVIA. The proposals do not comply with EN-1 paragraph 4.3.4, which requires applicants to demonstrate how significant negative effects are avoided, reduced, mitigated, or compensated. No compensation is offered for residual adverse landscape and visual	Agreed

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			effects. EPS agree with the overarching policy documents stated in the Landscape and Visual assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 13.2 Chapter 13 (Landscape and Visual) of the ES- [APP-226].	
EIA - Approach and Methods				
3.8.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual** ~~[APP-226]~~ **rApp_226Revision R1.** The Applicant notes that BMSDC generally do not have issues with the study area. The point of discussion relates to BMSDC suggestion to include viewpoints and visualisations outside the study area to demonstrate 'no significant effect'. The Applicant has not identified any significant effects beyond aooroximatelv 2km2 km of the Project and therefore considers this unnecessary. There are a number of viewpoints and visualisations beyond 2 km that demonstrate this point as highlighted in the Applicant's response to LV 1.24 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].**	Generally, we do not have issues with the study area, however, in relation to the visual assessment we feel there are opportunities outside the study area, where viewpoint assessments and visualisations could be taken to demonstrate 'no significant effect' that would aid understanding. ~~Enllnwinn A mPAtinn hplrl in .Inniinrx/ 2026, RM9DC note their position on this matter is unchanged.~~	Agreed
3.8.3	Data sources	Sufficient desktop and survey data	~~BMSDC remain unhappy with the number of~~	Agreed

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		(excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [ARR-226Revision B].** ~~The App cant has responded to the pc 4- about mapping~~ in ~~Table /1.20,~~ ID ~~13.108 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].~~ The Applicant suggests that the matter is agreed apart from the matter of landscape value which is discussed further in ~~8.3~~ytunder ID 3.8.4 below.	~~viewpoint assessments proposed (Email November 202/1).~~ ~~Whilst we welcome the~~ inclusion ~~of criteria against which~~ landscape ~~value will be assessed, we remain unhappy with aspects of the approach to Landscape Value assessment (Email 22.0/1.2025).~~ Generally, BMSDC welcomes the increase of viewpoints that are now presented in the ES. Although the number of viewpoints has been increased, BMSDC still judge there are critical gaps in the viewpoint distribution that need filling in order to demonstrate assertions regarding extent of significance. BMSDC welcome that all criteria in relation to sensitivity, value and significance for instance, have now been identified and presented in the ES, we retain issue with the approach to landscape value and value of the view and disagree with some of the judgements made. We welcome the changes made on the ~~other~~ data issues. ~~Following a meeting held~~ in ~~January 2026, BMSDC note their position on this matter~~ is ~~unchanged.~~	
3.8.4	Assessment methodology ~~(including LVIA methodology and viewpoints)~~	The assessment methodology is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B],** Paragraph 13.4.9 and Table A13.1.4 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]** set out the	BMSDC are satisfied with the assessment methodology yet remain unhappy with the number of viewpoint assessments proposed. ~~(Email November 202/1).~~ Whilst we welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value ~~(Email 22.0/1.2025).~~ ~~We also have reservations regarding the~~	Agreed

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		approach to consideration of landscape value. The Applicant's position regarding the approach to identifying landscape value is set out in Table 4.20, ID 13.93 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant has clarified the approach to identifying the value of views in Table 4.20, ID 13.105 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant suggests that the matter of the assessment methodology ~~apart from those within the context of the(excluding~~ viewpoints) can be agreed between both parties based on a meeting with Essex Place Services and BMSDC on 20th20 May 2026. The Applicant has responded on viewpoints under ID 3.8.4a.	~~methodology for assessing the value of views as this is heavily skewed towards published data.~~	
3.8.4a	~~The assessment methodology ?-set out~~ in ~~**6.13.A1 Environmental Statement Appendix 13.1 – Landscape and Visual Methodology rAPP-227].Viewp**~~ pints	The ~~Landscape and Visual~~ Impact ~~AssessmentLVIA~~ is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232].** Visualisations are provided in **7.12 Visualisations [APP-343 to APP-351$_{fc}$ REP4-180 to REP4-182].** The approach to selecting viewpoints is	In relation to viewpoints, whilst generally welcoming the increased viewpoint coverage, we retain concerns in select individual areas where there remain gaps in the coverage. In relation to valued landscapes see response at 3.8.3 above. We also have reservations regarding the methodology for assessing the value of views as this is heavily skewed towards published data. We retain concerns that without a separate valued landscape assessment the project cannot be judged fairly against policy in (EN-1) 5.10.12 'Outside nationally designated areas, there are local landscapes that may be highly valued locally' nor how	Not Agreed

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		set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].** The Applicant's approach to viewpoint selection is set-eutfurther discussed in Table 4.20, ID Annex C, 1.14 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The ~~Applicant has clarified~~viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground **(5.9.1 to 5.9.12 [Revisions D, E and F as relevant)).** The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066].** The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the **7.12 Visualisations [APR-350 - APP-351,**	the following in the current Holford Rules has been addressed, when the route was selected before landscape value criteria were included in the assessment: 'Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.' This issue relates particularly in several river valleys along the route. Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged. ~~Under discussion~~	

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		REP4-1821. The Applicant does not consider that further viewpoints are necessary. The existing suite provides robust and sufficient coverage to understand the likely significant effects of the Project, including within landscapes of higher value. The LVIA is not reliant solely on fixed viewpoints, but is underpinned by extensive fieldwork and professional assessment across the wider study area. Additional viewpoints in close proximity or with similar orientation would be unlikely to materially alter the assessment findings or conclusions. Accordingly, the Applicant considers that the assessment is robust, proportionate and compliant with best practice, and that the current viewpoint coverage is sufficient to inform the Examination. Part of the BMSDC position against this matter relates to the LVIA method in terms of landscape and visual value rather than viewpoints. Matters relating to method are considered under ID 3.8.4 and are agreed. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the ~~Landscape and Visual~~	The latest version of ES has been reviewed - key parameters and assumptions associated with	Agreed

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		Impact ~~AssessmentLVIA~~ are summarised in paragraph 13.4.20 in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APR-226Revision B].** The key parameters and assumptions presented are considered appropriate.	the Landscape and Visual assessment are acceptable.	
EIA - Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual rARP-226Revision B].** The baseline conditions and receptors presented are considered appropriate. ~~The Applicant's approach to viewpoint selection is set out in Table '1.20, ID AnnexC, 1.14 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~ ~~The Applicant has clarified the approach to identifying landscape value in Table 4.20, **ID 13.93 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~ ~~The Applicant has clarified the approach to identifying the value of views in Table 4.20, **ID 13.105 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~	Comments issued at Statutory Consultation (May/June 2024) in relation to Landscape and Visual Issues - BMSDC identified concerns with the Visual Receptors and Groupings have been identified based only partially on shared landscape characteristics and a similarity in the nature of views. BMSDC understand that, as the Project area is so large, the Visual Receptor Areas are a pragmatic way of organising the data, concerns were raised that clarity, and detail may have been lost as a result. BMSDC retain these concerns, yet recognise the approach taken. ~~BMSDC remain unhappy with the number of viewpoint assessments proposed. (Email November 2024).~~ ~~Whilst BSMDC welcome the inclusion of criteria against which landscape value will be assessed, we remain unhappy with aspects of the approach to Landscape Value (Email 22.04.2025).~~ ~~We also have reservations regarding the methodology for assessing the value of views as this is heavily skewed towards published data.~~ ~~An approach to compensation is needed, not just~~	~~Under discussion~~Agreed

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			~~mitigation, where and how it ha s beeiA ideR ti fied a Fid-~~ describedTdoowdhe applicant has sougdLengagemenl- ~~fr om t he local authorrt y on t hi s i ss ue e tc. (See below)~~ ~~We retain these concerns~~ ~~Following a meeting held m January 2026-1>MSDC-~~ nete4hek ¸ oGitien-on4hisaiaa#eids=eHGhan‿ed 0	
EIA- Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [ARR-4-3QRevision B]** and also paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [ARR-226Revision BI.** Embedded mitigation is considered appropriate, proportionate and robust to address potential effects. It is not possible for embedded mitigation measures to remove the significant residual effects of a project of this nature. Embedded mitigation includes the mitigation proposed in the Environmental Areas around specific substations and CSE compounds and also the 3:1 tree replacement where this occurs within the Order Limits. Embedded-mitigalion-isconsidered- ~~appropr-iate~~ in ~~terms of~~ its ~~nature and-~~ ~~scale, to address potential~~ effects.	Statutory consultation response stated that 'In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more use of undergrounding is reguired to protect valued local landscapes, long-distant rights of way and rural amenity sites.' We retain these concerns. BMSDC do not agree on the response as to why there no further undergrounding is proposed e.g. in the Gipping Valley which has the gualities of a Special Landscape Area. We do not see how this conclusion can be made in advance of a valued landscape assessment being carried out and shared with us. Local landscape designation has not been national policy for decades. The Holford Rules are out of date on this issue and haven't been reviewed since the 1990s when landscape characterisation became the tool for understanding landscape and guidance from the 2000s on valued landscape assessment outside designated landscapes was introduced. We welcome the inclusion of landscape value criteria as part of the LVIA. We retain concerns that this is not a full valued landscape assessment and that it	Under-discussionNot Agreed

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		The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10. The Applicant has clarified the approach to identifying landscape value in Table d.2Q, ID 13.93 of **8.8.2 Applicant's Comments on Local Impact Reports rREP2-030]under** ID 3.8.6. The Applicant acknowledges that residual landscape and visual effects remain in some locations, including within more sensitive landscapes. However, these effects have been fully assessed and are considered, on balance, to be acceptable in the context of the Project and its need case. The Applicant does not agree that further undergrounding or re routing is required. The current design re~presents an appropriate and balanced solution having regard to policy, landscape, environmental and engineering considerations. The Applicant's position on landscape and visual compensation is set out under ID 3.9.9a. matteFrThe Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is	hasn't informed route selection or the drafting of the order limits, also that judgments appear to be made at a local character type level rather than on the route corridor itself. Even if, as stated, *'policy statement EN-5 (which covers the development of new energy infrastructure) … concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid'* it doesn't follow that there are no significant residual negative effects and therefore that potentially further undergrounding or compensation *'as far as possible'* might be reguired. Where undergrounding isn't proposed, explanation is needed as to why compensation isn't being offered instead, except at substations and sealing end compounds, when the PEIR states that significant landscape and visual impacts will occur along the length of the project length. The ES confirms that significant landscape and visual impacts will occur along the length of the project length, so we retain deep concerns that further mitigation and compensation area needed Embedded mitigation measures are not addressing substantial significant negative residual impacts. As above, an approach to compensation is reguired. We have been calling for engagement on this issue since 2023. We retain concerns that engagement has not been initiated on appropriate and strategic landscape and visual compensation.	

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		recorded as Not Agreed.	Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.	
3.8.8	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to ti-mitavoid and reduce effects through adherence to good site practices and achieving legal compliance. Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual rARP-226Revision B]** and the **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ GJ.** The Applicant considers standard mitigation is-~~consideredto~~ be appropriate-artd-adequate iFHteffiAs eFHts-natHfe-aRd-scaleY proportionate and robust to address potential effects. The Applicant does not agree that the existence of significant residual effects demonstrates that the standard mitigation is inadequate. For a project of this scale and nature, it is neither reasonable nor practicable for standard construction mitigation measures to eliminate all landscape and visual effects. Rather, the purpose of these measures is to avoid and minimise effects where reasonably	Standard mitigation measures are not addressing substantial significant negative residual impacts. We retain concerns that engagement has not been initiated on appropriate and strategic landscape and visual compensation. Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.	Not Agreed

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		practicable. The Environmental Statement transparently identifies residual significant effects where these remain following the application of embedded, standard and any additional mitigation measures. The Applicant considers that the mitigation hierarchy has been appropriately applied and that the proposed mitigation package is consistent with the requirements of NPS EN-1 and relevant good practice guidance. The Applicant's position on landscape and visual compensation is set out under ID 3.8.9a. Accordingly, the Applicant considers that the standard mitigation measures are appropriate and proportionate to the effects identified. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
3.8.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures and has been considered as part of the iterative design and assessment process reported. ~~The consideration of additional mitigation measures is presented~~ in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [ARR-226Revision BI.** The Applicant does not agree that the	Additional mitigation measures are not addressing substantial significant negative residual impacts. BMSDC do not agree that the mitigation hierarchy has been effectively applied as it does not include compensation for the negative impacts of the overhead lines and pylons. An approach to compensation (see 3.8.9a) is reguired, where and how it will be identified and described, how the applicant will engage on this topic with the local authority. We do not consider the applicants have considered or met either the EIA	~~Under discussion~~Not Agreed

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		mitigation hierarchy has been inadequately applied. ~~The Applicant's approach to the mitigation hierarchy~~ isAs set out in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** ~~and the Applicant's position on~~ landscape ~~mitigation and compensation~~ is ~~set out~~ in ~~Section 3.10.the~~ Project has sought first to avoid and reduce effects through route selection, alignment refinement and embedded design measures before considering additional mitigation. This approach is consistent with the requirements of NPS EN-1 and established EIA practice. The Applicant also does not agree that the presence of residual significant effects demonstrates that additional mitigation is insufficient. For a project of this scale and nature, it is not always possible to avoid all significant landscape and visual effects. The Environmental Statement transparently identifies residual significant effects where these remain following the application of embedded, standard and additional mitigation measures. The Applicant further does not agree that the EIA Regulations or NPS EN-1 require compensation to be identified as a matter of course in order for the mitigation hierarchy to have been satisfied. The	Regs or EN-1 requirements in relation to compensation. It appears the likely significant negative landscape and visual effects of the project are generally not to be compensated for. We suggest the test of 'as far as possible' has not been met in any reasonable way in relation to the overwhelming likely permanent negative landscape and visual impacts along the length of the project described by the applicant within the PEIR. BMSDC retain concerns that engagement has not been initiated on appropriate and strategic landscape and visual compensation. ~~Following a meeting held~~ in ~~January 2026, BMSDC note their position on this matter~~ is ~~unchanged.~~	

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		assessment has considered all reasonably practicable opportunities to avoid and reduce effects, and the conclusions presented in the Environmental Statement reflect the residual effects following those measures. The Applicant's position on landscape and visual compensation is set out under ID 3.8.9a. Accordingly, the Applicant considers that the mitigation hierarchy has been appropriately applied, that the additional mitigation measures are proportionate to the effects identified, and that the assessment complies with the requirements of the EIA Regulations and NPS EN-1. ~~The Applicant will continue to~~ engage ~~with BMSDC on this matter.The~~ Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
3.8.9a	Compensation	The Applicant's position in relation to the policy requirement for landscape and visual compensation remains unchanged from that set out at ISH 2 and detailed in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 rREP4-302]** and most recently set out in the **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for**	BMSDC's view on the applicant's approach to landscape compensation planting remains a concern. We have been consistent in stating that a development of this scale and impact (on the landscape) should include a comprehensive, detailed and deliverable compensation scheme. The lack of clarity on compensation planting, the details of this, as well as how successful the management and maintenance will be, are the main issues.	Under discussion

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		Issue Specific Hearing 4 FREP6-118]. Without prejudice to this position, the Applicant has however provided indicative details of landscape and visual compensation measures in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199]** and will provide a mechanism to secure funding for such measures should the Secretary of State consider them to be necessary and meet the relevant legal tests. As explained by Counsel for National Grid at ISH4, National Grid is proposing the commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are reguired by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in **8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118],** should the Secretary of State consider the measures necessary there is a mechanism to secure these. Following review, the Applicant is now to secure the delivery of any offsite tree	Specifically, regarding the 3-1 replacement tree planting we would like to raise the following: Outstanding baseline information: • What definition of a tree is being used? (Size, within hedgerow, groups, etc) • How many trees being removed? (Linked to parish area) • Will the 3-1 include hedgerow removal compensation? Practical replacement issues: • What is the proposed replacement tree specification? (size, species, mix etc) • Are these trees available from UK nurseries? • How will the maintenance and establishment of the trees be managed and monitored? • Is there available space for tree planting and what land will be used? Other queries: • What tree species will be selected? (Like for like or other?) • What is the ownership, management and maintenance position for these trees? • What assurances are there that plant losses will be suitably replaced and managed to establishment? • Location- i.e. where will the trees be planted is no space is available in the immediate location of the losses?	

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		planting resulting from the commitment to replace individual trees and individual trees in small groups at a ratio of 3:1, by requirement and not by a unilateral s1Q6 agreement. BMSDC queries in relation to the 3:1 replanting commitment for individual trees are addressed where possible within **6.28 Outline Offsite Planting Delivery Scheme (OPPS) fREP6-128]** with further detail to be provided within the final OPPS. The 3:1 commitment does not relate to hedgerows which will be mitigated through the BNG metric. The Applicant is committed to continue discussions with BMSDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	• In areas where off-site locations are not available, how will compensation be provided? (NB: as with S1Q6 requirements, compensation needs to be provided within the location/near location associated with the project.) The general approach is compensation remains unclear. The applicant team are working to the assumption that compensation is not reguired. (Unless specifically instructed to provide via the Security of State.) We have been negotiating a compensation option, which may include a level on off-site landscape provision, but there are no assurances that this will be provided or delivered. We have remaining concerns that the wider NtT project proceeds without the explicit need to provide compensation. Timings and delivery mechanisms remain at an unresolved stage, without detail or clauses linked to the potential approval. As highlighted above (compensation), there remains several concerns and guestions regarding offsite planting. The 5year management and maintenance plan (including monitoring) is a concern. With long dry summers, watering will be essential to provide the environment for establishment. The expectation to check this planting (and replacements) also needs to be robust and adeguately resourced. Our team monitor the restoration planting for all the Essex Minerals extraction sites. This programme of monitoring is very resource heavy on the Local Authority and is linked to the necessary planning	

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			tools (Planning Conditions and Planning Enforcement) to ensure the correct scheme is implemented and managed.	
EIA - Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual** **[APP-226].** The assessment of **effects** during construction presented**Revision B]** and is considered appropriateby the Applicant to be robust, proportionate and consistent with relevant guidance and established LVIA practice. The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of **8.8.2 Applicant's Comments on Local Impact Reports rREP2-030]and** value of views under ID 3.8.4. The Applicant has clarified the approach to identifying the value of views in Table 4.20, **ID** 13.105 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant maintains that the assessment methodology and professional judgements applied are appropriate and have been applied consistently across the Project corridor. The Applicant does not agree that tree	Potential tree and hedgerow loss along the route has not been meaningfully guantified in landscape and visual terms in the assessment. BMSDC identified: • Numerous instances where we judge the extent of significant impacts on landscape character and receptors would be greater than identified in the ES. In particular there are concerns about the approach to landscape value and susceptibility, and value of the view, and the effect this has had on some of the judgements made. In relation to visual impact, we understand that the Visual Receptor Areas are a pragmatic way of organising the data, but fear clarity and detail may have been lost as a result. • Suggested changes to siting, alignment, viewpoint assessments and visualisations that have not necessarily been addressed. BMSDC have concerns in relation to changes to siting, alignment, viewpoint assessments and visualisations that have not necessarily been addressed. We also have concerns related to the extent of cumulative landscape and visual impacts on successive sections of the project, including at the periphery of the study area, has been properly considered • Instances where we judge the operational impacts	Under discussion \Not Agreed

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		and hedgerow loss has not been meaningfully quantified or assessed. With regard to vegetation loss, theThe assessment is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description rAPP-130Revision B** and presented on the **2.16 Trees and Hedgerows to be Removed and or Managed Plans [REP4-029 to REP4-036]. Revision C/D as relevant],** which identify the locations and extent of anticipated vegetation loss on a precautionary basis. The contribution of existing vegetation to landscape character and visual amenity has been taken into account within the assessment of both construction and operational effects. The Applicant can confirm that tree and hedgerow loss has been assessed as part of the assessment of effects on landscape character during construction and operation. This has also been captured within the Arboricultural Impact Assessment and Biodiversity Net Gain assessment. Accordingly, the Applicant considers that the assessment appropriately identifies and evaluates the effects of tree and hedgerow loss, landscape character change, visual impact and cumulative effects. The Applicant does not agree that	would be wider than stated in the ES. (see 3.8.11) Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.	

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		operational or construction effects extend beyond those reported in the Environmental Statement. As a mutually agreed position has not been reached, this matter is recorded as Not Agreed.		
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual** ~~**[APP-226].** The assessment of effects during operation (and maintenance) presented~~**Revision B],** and is considered ~~aporopriateby~~ the Applicant to be robust, proportionate and consistent with relevant guidance and established LVIA practice. The Applicant has clarified the approach to identifying landscape value in ~~Table d.2Q,~~ ID ~~13.93 of~~ ~~**8.8.2 Applicant's Comments on Local Impact Reports fREP2-030].and**~~ value of views under ID 3.8.4, and maintains that these judgements have been applied consistently and appropriately across the Project. The Applicant acknowledges that significant operational landscape and visual effects have been identified in certain locations and has reported these transparently within the Environmental Statement. However, the Applicant does	BMSDC retain concerns with the issues as identified in 3.8.10 particularly regarding how the approach to landscape value and susceptibility, and value of the view might have impacted on some of the judgements made. Our position is that in order to reduce significant landscape and visual impacts further at the operational stage more use of undergrounding or re-routing or other significant mitigation is required, particularly in river valleys, to protect valued local landscapes, long-distant rights of way and rural amenity sites. The ES acknowledges there will be a significant negative landscape and visual impact at both construction and operational stages over the length of the Project. And yet no substantive proposals have been put forward in terms of off-setting or compensation to deal with this. The issues in relation to this remain substantially unaddressed (see 3.8.9a). ~~Following a meeting held in January 2026, BMSDC note their position on this matter is unchanged.~~	~~Under discussion~~ Mot Agreed

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		not agree that the presence of residual significant effects demonstrates that the assessment is flawed or that the mitigation hierarchy has not been properly applied. The Project has undergone extensive route selection, alignment refinement and design development to avoid and reduce effects where reasonably practicable, and the current alignment represents a balanced outcome having regard to environmental, technical, engineering and deliverability considerations. The Applicant does not agree that further undergrounding, rerouting or other substantial design changes are justified. Such alternatives have been considered through the design evolution process and would introduce additional environmental, technical and commercial constraints which, when considered in the round, would not result in a materially preferable outcome- Matters relating to landscape and visual compensation are addressed separately under ID 3.8.9a. The Applicant's position remains that the assessment of operational effects is robust and policy compliant, and that the conclusions reported in the Environmental Statement remain appropriate. Accordingly, the Applicant does not agree that operational effects extend beyond		

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		those reported in the Environmental Statement, nor that further design intervention is required. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed. ~~The Applicant has clarified the approach to~~ identifying ~~the value of views~~ in ~~Table 4.20,~~ **ID** ~~13.105 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**~~		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	The Applicant does not agree that construction access routes have been identified without detailed consideration of existing landscape features. Construction routes have been developed through the iterative design process, informed by environmental, engineering, landownership and operational considerations, with the aim of minimising effects on landscape features, including trees and hedgerows, wherever reasonably practicable. **7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual ~~rAPP-226Revision~~ B]** and is appropriate	~~The content of the CoCP~~ is ~~still under discussion.~~ ~~Following a meeting held~~ in ~~January 2026, BMSDC note their position on this matter~~ is ~~unchanged.~~The broad location and alignment of the construction routes remain a concern. Numerous instances where construction routes have been routed without any detailed site analysis of the existing landscape and features raise concern. These will result in several unnecessary tree and hedgerow removal. Concerns around replacement planting and its establishment also remain a concern, with a lack of detail to provide assurance.	~~Under discussion~~ Mo t Agreed

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		for managing construction impacts from the Project. The Applicant also notes that potential vegetation losses have been identified on a precautionary basis and represent a worst-case assessment. Detailed design and site-specific surveys will inform the final extent of any removals and the associated protection measures. A meeting was held in October 202d to agree on the structure for the Outline CoCP. A further meeting was held in January 2025 to address comments from stakeholders. A meeting was held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.Accordingly, the Applicant considers that construction route selection, vegetation impacts and replacement planting have been appropriately assessed and secured through the Project's mitigation framework. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
3.8.13	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan rREP3-030Revision** £ includes all relevant operational related	The content and structure of the oLEMP is still under discussion as highlighted in emails sent on October 22 2024 and 28 January 2024.	Under discussionNot Agreed

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		mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual ~~rAPP-226Revision~~ B]** and isprovides an appropriate and secured framework for the implementation, management, monitoring and maintenance of those measures. ~~Meeting held on 9 October to agree on the structure for the Outline LEMP. A further meeting was held on 29 January 2025 to address comments from stakeholders.~~ ~~Meeting held~~ in ~~March 2025 to discuss the second~~ iteration ~~of the Outline LEMP.~~ ~~A further~~ iteration ~~of the Outline LEMP~~ was issued in ~~May 2025 following the meeting and feedback~~ in ~~writing.~~ The Applicant notes BMSDC's concerns regarding the scope, definition and delivery of compensation, including matters relating to location, land ownership and suitability of any off-site measures. The Applicant's position on landscape and visual compensation is set out under ID 3.8.9a. The Applicant's position remains that landscape compensation is not required by policy; however, the Applicant has provided information on potential compensation measures and a mechanism to secure such measures should the Secretary of State determine	BMSDC retain major issues with the LEMP, particularly in relation to definition, scope and scale of the term 'compensation'. Offsite compensation remains unresolved, especially the detail concerning the location, land ownership and detailed suitability of what could be achieved. ~~Following a meeting held~~ in ~~January 2026, BMSDC note their position on this matter is unchanged.~~	

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		that they are necessary and meet the relevant legal and policy tests. ~~The Applicant~~ is engaging ~~with BMSDC on this matter.Accordingly,~~ the Applicant considers that the Outline Landscape and Ecological Management Plan provides an appropriate and robust framework for the delivery of operational landscape mitigation. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
Other matters as required				
3.8.14	Landscape at Bramford Substation	The Applicant acknowledges the concerns raised by BMSDC and SCC regarding the cumulative landscape and visual effects in the vicinity of Bramford Substation and the suggestion that a wider landscape-scale masterplan should be developed for the area. At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017. The EIA started early in the process,	BMSDC concur with SCC and considers that not ~~to provide an Environmentalto~~ provide an Environmental Area / landscape-scale landscape ~~andvisualand~~ visual mitigation proposals around Bramford substation would only be acceptable, ~~if there was a coordinatedif~~ there was a coordinated Landscape Master Plan ~~for the widerfor~~ the wider Bramford substation area ~~in cooperationin~~ cooperation with other projects ~~in the areain~~ the area. SCC considers that the position of the Applicant is unacceptable and that landscape scale compensation is required the around Bramford/Burstall area. SCC has set out its position in the LIR **[REP1-178],**	~~Under discussion~~Not Agreed

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		and in that respect, a considerable amount of assessment work was undertaken ~~to allowto~~ allow preliminary judgements to be made about the design and routeing ~~of the Projectof~~ the Project. This is set out in a number ~~of documentsof~~ documents including **5.1 Consultation Report ~~rAPP-066Revision~~ B]** and **5.15 Design Development Report [APP-122],** with feedback helping shape the Project. Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals ~~for rationalisationfor~~ rationalisation and undergrounding ~~of severalof~~ several sections of existing 132 kV overhead line together with careful consideration of the routeing ~~of the proposedof~~ the proposed 132kV underground cables and 400 kV overhead line into and out of the substation. The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects ~~and otherand~~ other schemes in the local area. ~~An assessment of Cumulative Effects~~An assessment of cumulative effects has been undertaken in accordance with **6.19 Scoping Report [APP-288 - 296]** ~~and **6.20and**~~ **6.20 Scoping Opinion [APP-297]** and is		

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		presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects rARR-2S4Revision B]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B],** This includes ~~an assessmentan~~ assessment of cumulative landscape ~~and visualand~~ visual effects around Bramford Substation including the Bramford toTwinstead Project. Significant cumulative landscape ~~and visual~~ effects ~~are recognised,~~ and visual effects have been transparently identified where supported by the evidence. The Applicant does not agree that the absence of a coordinated landscape masterplan for the wider Bramford area renders the Project unacceptable or demonstrates a deficiency in the assessment. The Applicant's obligation is to assess and mitigate the effects of the Project itself. Wider strategic landscape interventions extending beyond the Project and involving multiple schemes, promoters and land interests are not necessary to demonstrate compliance with the EIA Regulations or the National Policy Statements. Notwithstanding the Applicant's position on landscape and visual compensation set out in ID 3.8.9a, the Applicant has		

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		engaged with the Council and provided details of compensatory measures in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans FREP5-199]** and will provide a mechanism to secure such measures should the Secretary of State consider them to be necessary and meet the relevant legal tests. ~~The Applicant~~ is ~~continuing to~~ engage ~~with the Council on this matter.~~ ~~Accordingly,~~ the Applicant considers that cumulative landscape and visual effects have been appropriately assessed, that appropriate mitigation has been incorporated into the Project design, and that no further strategic masterplanning requirement is necessary to support the Application. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		

3.9 Socio-economics, Recreation and Tourism

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

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and	The policy context, legislation and	BMSDC comments raised in November 2025	

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	legislation	guidance considered when undertaking the Socioeconomics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning ~~rAPP-126Revision~~ B]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APR-265Revision C].** The following information is in response to comments raised in December 2025: • The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job demand of approximately 480 roles over the four year construction period. Notwithstanding this, the Applicant is committed to working constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with	following reviewing of the Statement of Common Ground • As noted in previous responses, no Economic Strategies, Tourism/Visitor Economy Strategies, Skills plans or needs analysis have been reviewed as part of the assessment of regional and local policy, only Local Plans. This potentially skews the understanding of the existing economy and therefore the potential impact from this development.	Not Agreed HRHHH BHHBB

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		established guidance. A review of the Babergh & Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy has been undertaken and broadly align with the Local Plan. It is considered that the Babergh & Mid Suffolk Economic Strategy and Culture, Heritage and Visitor Economy Strategy would not result in material changes to the conclusions of the Socio-economics, Recreation and Tourism assessment.The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Approach and Methods				
3.9.2	Study area	The-6.20 **Scoping Opinion [APP-297]** stated: *"The Applicant should seek to agree the study area with the relevant local authorities".* A meeting was held in November 2024 to seek to agree this point in the-**6.20 Scoping Opinion [APP-297].** BMSDC stated in their statutory consultation response: *"It is welcomed that the Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has been any direct engagement with these councils to understand their position in*	BMSDC stated in their statutory consultation response: *"It is welcomed that the Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has been any direct engagement with these councils to understand their position in relation to the potential impact of this proposal."* BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • BMSDC recognise that the Local Study Area has been expanded to a 3km radius as opposed to the 500m radius initially proposed. This is welcomed, but the Councils believe that this is still	~~Under discussion~~Not Agreed

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		relation to the potential impact of this proposal." The ff third Technical Note was issued in March 2025 to seek agreement on the study area and methodology. The following information is in response to comments raised in December 2025: • Section 42 consultation documents were provided to Norwich City Council, West Suffolk Council and Ipswich Borough Council during pre-application following the completion of the Preliminary Environmental Information Report (PEIR). • Direct engagement with Norwich City Council, West Suffolk Council and Ipswich Borough Council has been undertaken pre-application during the preparation of the Environmental Statement (ES) in March 2025. • West Suffolk Council confirmed that they have no comment to make on the Project. • Norwich City Council has not responded to the request for engagement and Ipswich Borough Council has not provided a response following, requesting the technical note. • Direct access to businesses and	unacceptable as this is only relevant when assessing visual impact, not wider impacts to businesses or communities from the development. Access to facilities during construction is likely to be felt on a much wider radius than just within the order limits, even the 3km study area isn't likely to be wide enough to have adequately captured the businesses who would be affected. If the venue isn't within the order limits, but its access, customers or suppliers are, or vice versa, this should still be considered when assessing potential impact or if the construction of the haul road necessitates a larger diversion. A variable approach to this local study area boundary could be considered to identify issues across a wider geography that are relevant during the construction phase, but not during operations and vice versa.	

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		community facilities has been considered within the Socio-economics, Recreation and Tourism assessment. The Applicant recognises that there may be indirect economic implications for individual businesses, including potential effects on business supply chains. However, in order to maintain a proportionate assessment, the focus remains on those impacts that are likely to be significant. Potential perceived impacts arising from the visibility of the Project are noted within the **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism ~~rAPP-265Revision~~ C]** (see Table 15.22: Potential residual construction effect on built and other assets and Table 15.28: Residual operation (and maintenance) effect on built and other assets). However, these financial matters fall outside the scope of the Environmental Impact Assessment (EIA) and will be addressed separately through direct engagement with landowners.The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.3	Data sources	Sufficient desktop and survey data has	Statutory consultation response: "A *range of the data*	

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		been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C],** In response to the statutory consultation response: baseline data on employment and economic activity have been gathered for the Socio-economics, Recreation and Tourism PEIR assessment. This will also be undertaken for ES stage. However, for the purpose of local economy and employment assessment, one dataset is required for the Wider Study Area in order to maintain a proportionate assessment. The following information is in response to comments raised in November 2025: Background data of each district forms the Wider Study Area baseline data report in the **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [ARP-265Revision C],** Table 15.9: People in employment by major occupational group, and Table 15.10: Skills and qualifications held by working aged people (16-64) within the Wider Study Area. *-The applicant acknowledges the data provided by Ipswich Borough Council. The accommodation bedspace uses the	*in the ES is not broken down by District. There is a huge variation in this data across the region and it would be preferable if this data wasn't amalgamated in this way."* BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • Through use of the VisitBritain hotel occupancy survey from 2016, the number of bedspaces has been inflated and occupancy details have been under-represented. Based on an Ipswich Borough Council commission in 2018, the Ipswich Urban area average occupancy for hotels was 68%; and the average for Suffolk Coastal District was 74%. This section also does not take into account challenges post Covid with changes in behaviour, reduction in hotel/self-catering units or issues relating to cumulative demands on accommodation from other NSIPs including Sizewell and offshore wind alongside other major local developments. VisitBritain data on self-catering occupancy is available, but has not been used -https://www.visitbritain.org/research-insights/uk-short-term-rentals. • Deprivation and wider data - An updated IMD has been released and should be used within this section. • All data should be reviewed to ensure that it is as accurate as possible and using the most up-to-date information e.g. Economic Activity data	Not Agreed

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		occupancy of approximately 83% on average across serviced and non-serviced accommodation. This is higher than the percentage presented in the response (i.e. 68% and 74%). Hence, considered robust to form the accommodation bedspace assessment. •-The assessment recognises that the Covid-19 pandemic has influenced behaviour and the hospitality sector. To ensure accuracy and relevance, our analysis relies on the latest available official data sources to ensure that our findings and recommendations are evidence-based. Self-catering occupancy bedspaces are captured under the 'non-serviced accommodation'. Updated IMP 2025 data has been provided in **8.16 Health and Wellbeing and Socio economics, Recreation and Tourism Technical Note FREP4-317]** in response to the ExA's Rule 17 letter **rPD-019].** The Technical Note compares IMP 2019 and 2025 data at local authority and LSOA level; the Technical Note concludes that while some local authorities have experienced relative worsening or improvement in deprivation rankings, these shifts are generally marginal and do not materially alter the overall deprivation profile of local	is available for 2025 and the 2024 Volume & Value data is available for the value of tourism to the economy. e There is an absence of reference to several key documents and sources of data that will enhance the provided socio-economic assessment. These include the Economic Strategy for Norfolk and Suffolk and the Technical Legacy Report for Norfolk and Suffolk and the Culture, Heritage and Visitor Economy Strategy for Babergh & Mid Suffolk.	

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		authorities along the Project. The findings of the assessment are therefore not considered to materially alter. IMP 2025 baseline data has been included in an updated version of ES Chapter 15 Socio economics, Recreation and Tourism, which is being submitted at Deadline 6. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.4	Assessment methodology	The **6.20 Scoping Opinion [APP-297]** stated: *"The Applicant should seek to agree the study area with the relevant local authorities'*[1] and *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".* A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. The following information is in response to comments raised in November 2025: • The level of the sensitivity matrix has been guided by various EIA guidance. We have also included other criteria in assessing the sensitivity of business, recreation and tourism assets. Hence, multiple factors have been considered instead of being solely based on visitor	BMSDC comments raised on 17th November 2025 following reviewing of the Statement of Common Ground: • The assessment criteria that have been shared as part of the ES are believed to be flawed. The proposed development is primarily crossing a very rural area, very few of the major attractions across Suffolk have over 100,000 visitors a year. Likewise, there are a very small number of businesses which are of national or international importance, but the majority of businesses are of regional significance, therefore by definition, they are all excluded from the "high sensitivity" assessment. It is still recommended that this threshold is reconsidered and a different approach to assessing impact is proposed to better reflect the local market which is more realistic and doesn't set sensitivity levels so high as to unnecessarily exclude the majority of businesses. A baseline assessment also needs to be	~~Under discussion~~Not Agreed

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		numbers. These also include if the receptor is the only service in the local area/region or if other services are available. A baseline assessment for each receptor has been undertaken and presented in the ES chapter. • The potential duration of impacts have been set out in the ES, noting the potential for short-term, medium-term and longer-term construction effect. • We recognise that employment sectors differ in their proportionality and local importance across areas such as Mid Suffolk, Thurrock, and Basildon. Baseline data for each LPA has been gathered. To ensure consistency, a standard approach is applied across the Wider Study Area within the assessment.The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	completed to understand current operating arrangements to ensure that the impact of development on the business can be mitigated. • We also reguire further clarification on the definitions of "moderate" impact or "small" impact as this is open to interpretation and will vary depending on the size of business impacted. • The assessment criteria are also skewed and unlikely to be relevant for most accommodation providers, irrespective of the scale of impact, as most accommodation providers, with the exception of very large hotels or campsites, will have substantially less than 10,000 guests a year. The assessment criteria also do not take into account the length of time that the business faces disruption and how freguently. The criteria within the assessment of impact doesn't take into account significant regional variations in employment patterns - the employment sectors within Mid Suffolk in terms of proportionality and local importance will not be the same as those within Thurrock or Basildon and shouldn't be cumulatively assessed before deciding if the impact is severe enough.	
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C|.** The key	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • The assumptions made within this section need to be reassessed based on cumulative impact from multiple NSIPs operating within the same time frame, particularly Sizewell, as this will impact on	~~Under discussion~~Not agreed

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		parameters and assumptions presented are considered appropriate. The following information is in response to comments raised in November 2025: • Cumulative effects are set out in a separate ES chapter, under **6.17 Environmental Statement Chapter 17 - Cumulative Effects - Response Update ~~rREP4-163Revision~~ B],** Sizewell C is located over 30km from the Order Limits. Due to the extensive distance from the Project, it was not considered in the inter-project cumulative effects assessment. ♦-The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	the workforce and accommodation available for non-local workers.	
EIA - Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C].** The baseline conditions and receptors presented are considered appropriate. The following information is in response to comments raised in November 2025: • Baseline information for the	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • Deprivation and wider data - An updated IMD has been released and should be used within this section. • All data should be reviewed to ensure that it is as accurate as possible and using the most up-to-date information e.g. Economic Activity data is available for 2025 and the 2024 Volume & Value data is available for the value of tourism to	~~Under-discussion~~Agreed

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		assessment has been gathered using the most recent and reputable publicly available sources at the time of writing. Please notenot Regional IMP updatede that any data published after the submission of the Development Consent Order (DCO) will not be reflected in the Environmental Statement, due to timing constraints. ♦-Updated IMP 2025 data has been provided in **8.16 Health and Wellbeing and Socio economics, Recreation and Tourism Technical Note [Revision C]** in response to the ExA's Rule 17 letter **[PD-019J.** The Technical Note compares IMP 2019 and 2025 data at local authority and LSOA level; the Technical Note concludes that while some local authorities have experienced relative worsening or improvement in deprivation rankings, these shifts are generally marginal and do not materially alter the overall deprivation profile of local authorities along the Project. The findings of the assessment are therefore not considered to materially alter. IMP 2025 baseline data has been included in an updated version of **6.15 Environmental Statement Chapter 15 Socio economics, Recreation and Tourism [REP6-070],** which was submitted at Peadline 6.	the economy. **July 2026 update:** BMSDC note that the regional IMP has been updated. •	

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EIA- Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism** ~~rAPP-265Revision~~ **C],** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • BMSDC acknowledge the proposed embedded mitigation measures including underground cabling across the Dedham Vale National Landscape and avoidance of community facilities, businesses, tourism or recreational assets where possible across the route corridor.	Agreed
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism** ~~[APP-265~~ **Revision C]** and set out in **7.2 Outline Code of Construction Practice** ~~[REP4-164].~~ **Revision GT** Mitigation measures contained within **7.3 Outline Construction Traffic Management Plan [Revision F]** address impacts of construction traffic on communities and travel. This includes working with local stakeholders including schools, local bus operators, GP surgeries to ensure disruption caused by AIL deliveries is minimised. The standard mitigation presented is	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • The standard mitigation is noted, however, it is not believed to be sufficient to mitigate the impact on businesses and communities from this development. • There is no recognition or acknowledgement or mitigation proposed to address the incidental impacts of construction on communities and travel to work, education, healthcare or provision of services. The development is proposed in a rural area with limited routes for public transport, and potentially lengthy diversion routes if any of these main routes are impacted during construction, therefore, the impact on the affected communities could be significant.	Under discussion

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		considered appropriate and adequate, in terms of its nature and scale, to address potential effects. ~~The following~~ information is in ~~response to comments raised~~ in ~~November:~~ ~~• The assessments~~Assessments relating to potential effects on community safety in regard to traffic, access to social infrastructure, and access to jobs are set out in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-4£2Revision C].** The Applicant is committed to continue discussions with BMSDC regarding specific matters relevant to the Construction Traffic Management Plan, including signage for local businesses and matters relating to 'Quiet Lanes' which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	July 2026 update: • Issue around traffic disruption during construction have not been resolved. An updated Construction Traffic Management Plan is expected, but not yet received. This may or may not resolve outstanding concerns in relation to this issue.	
3.9.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C].** Additional mitigation is considered appropriate and adeguate, in terms of its nature and scale, to address potential	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • No additional mitigation has been proposed to address impacts within Babergh or Mid Suffolk.	Agreed

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		effects.		
EIA - Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism rAPP-265Revision CI.** The assessment of effects during construction presented is considered appropriate. The following information is in response to comments raised in November 2025: • The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or largescale regeneration schemes.	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • The ES notes potential for supply chain benefits but lacks a scenario-based assessment of local procurement opportunities. • The Council's guidance requires promoters to distinguish hyper-local (district), local (county), and regional (East of England) supply chain opportunities, and to assess them under low/medium/high engagement scenarios. This has not been undertaken. Without such modelling, there is no robust estimate of indirect or induced employment or Gross Value Added ("GVA"). There is also insufficient recognition of potential negative effects, including wage inflation, diversion of capacity from SMEs, and supply chain saturation due to overlapping NSIPs. • The assumption at this stage that the contracts will be let to "specialist contractors who may not be based within the local area" implies that local contractors who may be of a scale to bid for these contracts are not being actively encouraged to is unacceptable. Every effort should be made to ensure that all opportunities are made available to contractors and support provided to ensure open access to all for these contracts. The ES recognises construction workforce needs but	■Under ~~discussion~~Not Agreed

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		• The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: - Working with local suppliers and supporting forums, such as Chambers of Commerce - Contributing to a coordinated regional approach to electricity industry jobs and skills planning - Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. • These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement • As stated in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism** ~~rAPP-265Revision~~ C], paragraph 15.7.7, at this stage of project development, the level of	does not provide the granular modelling by project phase (civils, mechanical and electrical, commissioning) that the Council's Supplementary Guidance requires. This omission prevents accurate alignment with local training pipelines. The Applicant assumes that only 10% of the construction workforce will be drawn from the Wider Study Area. This risks underestimating local labour capacity and opportunity, while also failing to model displacement effects from other NSIPs (Sizewell C, Sea Link, North Falls, Five Estuaries).	

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		information required to undertake a detailed scenario-based assessment of local procurement opportunities is not yet available. This information will be available as the project progresses and further procurement information becomes available. • All baseline data gathered as part of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism ~~rAPP-265Revision~~ C]** has been broken down to District / Borough Council level, including data on occupational group (Table 15.9: People in employment by major occupational group), skills (Table 15.10: Skills and qualifications held by working aged people (16-64)), and industrial group (Table 15.11: Employment by broad industrial group). Data at this level is considered appropriate and proportionate for an assessment of this nature and enables assessment of impacts on the local economy and employment. This approach is based on professional judgement, engagement with Local Planning Authorities and knowledge of previous similar projects, including the Bramford to Twinstead Reinforcement. • The Applicant is committed to working		

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		with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through community benefit mechanisms, rather than through a statutory planning condition or Requirement. • The example of the potential local construction workforce required is set out in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C],** paragraph 15.7.13. • The level of job uptake will be skills level dependent, as well as taking into account suitability. Therefore, the Project is not able to confirm at this stage on the size and diversity of the labour market. • At this stage, the 10% assumption reflects currently available data for		

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		similar projects undertaken by the applicant. This is intended as a conservative estimate given uncertainties in detailed workforce mobilisation plans, supply chain commitments, and the timing and overlap of other major infrastructure projects in the area. •-The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.9.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C].** The assessment of effects during operation (and maintenance) presented is considered appropriate. • Receptors local within the Order Limits (i.e. local study area) are set out in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~[APP-265Revision~~ C].** For example, Dedham Vale National Landscape is set out in the ES chapter. • Whilst receptors located within a 3 km buffer from the Order Limits (i.e. 3 km	BMSDC comments raised in November 2025 following reviewing of the Statement of Common Ground: • Following some challenges with the quality of data that NGET included within the draft Environmental Statement (ES), we are concerned that the final submission does not rectify this error. Suffolk offers a rich and varied tourist offer known for its heritage assets, landscape designations and promoted areas, such as, two designated AONBs, the Dedham Vale, Stour Valley, Waveney Valley and Suffolk's Wool Towns. NGET needs to fully assess the direct and indirect impacts of this project and its associated infrastructure on all of these known features and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for recreational activity. The proposed route will also impact known visitor attractions such as	~~Under discussion~~ Mot Agreed

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		study area) are set out in **ES6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area ~~rAPP-226Revision~~ B],** For example, the Bressingham Steam Museum & Gardens are set out in the ES Appendix 15.1. • Through routeing, sitting and detailed design, the applicant has sought to reduce, as far as practicable, potential impacts on visitor attractions. • The Applicant recognises, however, that there could be indirect economic effects to individual businesses. These potential perceived effects due to the visibility of the Project are noted in **ES-6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C],** but would be subject to separate landowner discussions and compensation arrangements. • Anumberof ~~mitigationsmitigation~~ measures will be in place to manage potential impacts during construction. These include but not limited to the- **7.3 Outline Construction Traffic Management Plan ~~rREP4-0174Revision~~ F], 7.6 Outline Public Rights of Way Management**	Bressingham Steam and Gardens, Needham Lake, Hintlesham Hall, R8PB Wolves Wood, and these sites have not been picked up within the 3km radius for the local study area. More broadly, it is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during the construction period. • The Councils anticipate that the proposed development, given its location across the Dedham Vale AONB and the Stour Valley project area could have significant impacts upon visitor perception and ultimately visitor numbers, both during construction and during operation. This will be exacerbated due to the combination of other projects happening simultaneously in the area, hence the reason for reguesting that all NSIPs are considered on a cumulative basis, particularly as the Applicant are directly responsible for a number of these current proposals. Hence it is not acceptable for this impact to remain unassessed. The Councils expect NGET to develop initiatives or provide local funds that can be used to counteract the negative impacts upon tourism.	

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		Plan ~~[REP4-178Revision~~ D], and 7.2 Outline Code of Construction Practice ~~[REP4-164Revision~~ g]. Cumulative effects are set out in **6.17 ES Chapter 17 - Cumulative Effects - Response Update ~~rREP4-163Revision~~ BI.** ♦-The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism ~~rAPP-265Revision~~ C]** and is appropriate for managing construction impacts from the Project. Additional commitments have been included in **7.2 Outline Code of Construction Practice [Revision G]** relating to preparation of a detailed Communication Strategy and a complaints procedure. Further detail relating to the complaints procedure has been submitted at Deadline 6 in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement**	~~No comments received on the structure of the Outline CoCP (1st and 2nd~~ Iterations) ~~at the time of writing.~~ It ~~is therefore assumed that the structure of the CoCP is agreed.~~ BMSDC confirmed in their comments on the Statement of Common Ground provided in November 2025 that the content of the CoCP iswas still under discussion. **July 2026 update:** Awaiting updated Construction Traffic Management Plan before providing further comment on this issue.	Under discussion

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		and Public Information [REP6-078]. ~~A meeting was held~~ in ~~October 2Q2d to agree on the structure for the Outline CoCP **[APP-300].** A further meeting was held~~ in ~~January 2025 to address comments from stakeholders.~~ ~~A meeting was held~~ in ~~March 2025 to discuss the second~~ iteration ~~of the Outline CoCP **[APP-300].**~~ ~~A further~~ iteration ~~of the Outline CoCP **[APP-300]** was~~ issued in ~~May 2025 following the meeting and feedback~~ in ~~writing.7.3~~ **Outline Construction Traffic Management Plan [Revision F]** addresses impacts of construction traffic on communities and travel. The Applicant is committed to continue discussions with BMSDC regarding specific matters relevant to the Construction Traffic Management Plan, including signage for local businesses and matters relating to 'Quiet Lanes' which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
~~**Other matters as required**~~				

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3.10 Cumulative Effects

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

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EIA - Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context** ~~rAPP-126Revision~~ B] and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects -** ~~Response Lit itp IRFP/1-11~~ B]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	No comments raised in the BMSDC relevant ~~representations or through review of the Statement of~~ Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	~~Under~~ ~~ui&uua&iuii/-\g~~ reed
EIA - Approach and Methods				
3.10.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.10.3	Data sources	~~SufficientThe~~ Applicant maintains that sufficient desktop and survey data has been collected to inform the assessment as presented within Sections 17.4 and	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects.	Under discussion

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		17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B],** Since April 2025 the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and continues to do so during the Examination period, to check whether there are any new relevant developments / allocations. An update was provided at Deadline 4 **(6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163K),** and a further update will be submitted at Deadline 7. The update that will be provided at Deadline 7 will include an assessment of the Norwich to Tilbury Project with the proposed Alcemi battery energy storage system (BESS) and associated works at land near Bramford Substation. Noting that a cumulative effects updated will be submitted by the Applicant at deadline 7, this matter will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BMSDC confirmed in an email on the 18 June 2026 that this matter was to remain under discussion following confirmation that a commitment to include Alcemi BESS at Bramford/Burstall is included at Deadline 5. Noting that a cumulative effects updated will be submitted by the Applicant at deadline 7, this matter will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	
3.10.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288]** to **[APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Inspectorate.		
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Sections 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects - Response Update ~~rREP4-163Revision~~ B],** The key parameters and assumptions presented are considered appropriate.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	~~Under discussion~~Agreed
EIA - Baseline Conditions				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters **Chapters 6-16** of the **Environmental Statement [APP-138 to APP-280].** The baseline conditions and receptors presented are considered appropriate.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration).	~~Under discussion~~Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters **Chapters 6 - 16** of the **Environmental Statement [APP-138** to	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026	~~Under discussion~~Agreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		APP-280]. Embedded mitigation measures, designed as an inherent part of the Project are set out in the environmental topic chapters of the **Environmental Statement [APP-138** to **APP-280].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	
3.10.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters **6 - 16** of the **Environmental Statement [APP-138 to APP-280].** Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters and set out in **7.2 Outline Code of Construction Practice [REP4-164Revision G]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	Under discussionAgreed
3.10.9	Additional mitigation	The consideration of additional mitigation measures is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281Revision B]** and in **6.17.1 Environmental Statement**	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further	Under discussionAgreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
		Chapter 17 - Cumulative Effects - Response Update [REP4-163Revision B]. Additional mitigation is considered appropriate and adeguate, in terms of its nature and scale, to address potential effects.	comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	
EIA - Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects IAPP-281Revision B|** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163Revision B|.** The assessment of effects during construction presented is considered appropriate.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	Under discussionAgreed
3.10.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects fAPP-281Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163Revision B],** The assessment of effects during operation (and maintenance) presented is considered appropriate.	No comments raised in the BMSDC relevant representations or through review of the Statement of Common Ground for this area around Cumulative Effects. BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for items on Economic Development (skills, tourism, etc) and Environmental Protection (noise, vibration)	Under discussionAgreed

ID	Matter	National Grid's Position	Babergh and Mid Suffolk District Councils' Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	**7.2 Outline Code of Construction Practice ~~rREP4-164Revision~~ G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects) - Response Update ~~[REP4-163Revision~~ B]** and is appropriate for managing construction impacts from the Project. A meeting was held in October 2024 to agree on the structure for the **7.2 Outline** CoGR **Code of Construction Practice [APP-300].** A further meeting was held in January 2025 to address comments from stakeholders. A meeting was held in March 2025 to discuss the second iteration of the **7.2 Outline CeG Code of Construction Practice [APP-300].** A further iteration of the **7.2 Outline** ~~CoCP -~~ **Code of Construction Practice [APP-300]** was issued in May 2025 following the meeting and feedback in writing.	No comments received on the structure of the Outline CoCP (1st and 2nd Iterations) at the time of writing. It is therefore assumed that the structure of the CoCP is agreed. The content of the CoCP is still under discussion~~.~~ BMSDC confirmed in an email on the 18th June 2026 that this matter was agreed subject to any further comments for Environmental Protection (noise, vibration).	~~Under discussion~~Agreed
~~**Other matters as required**~~				

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3.11 Development Consent Order

3.11.1 Babergh and Mid Suffolk District Council defer to Suffolk County Council regarding the draft Development Consent Order and proposed requirements within the Statement of Common Ground, and will work alongside all host authorities and the Applicant to progress this separately.

4. Confirmation of Agreement

The above SoCG is agreed between the National Grid and Babergh and Mid Suffolk District Council on the date specified below.

Signed for and on behalf of National Grid:

DocuSigned by:
[redacted]
14A1726D0B7A4A8 [redacted]

Date:

20/07/2026

Signed for and on behalf of Babergh and Mid Suffolk District Council:

[redacted] [redacted]

Date:

20/07/2026

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Abbreviations

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

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Abbreviation	Full Reference
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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Embedded Excel	0
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