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Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.9 Signed Statement of Common Ground - Braintree District Council - Clean Version

Final Issue D

July 2026

Planning Inspectorate Reference: EN020027

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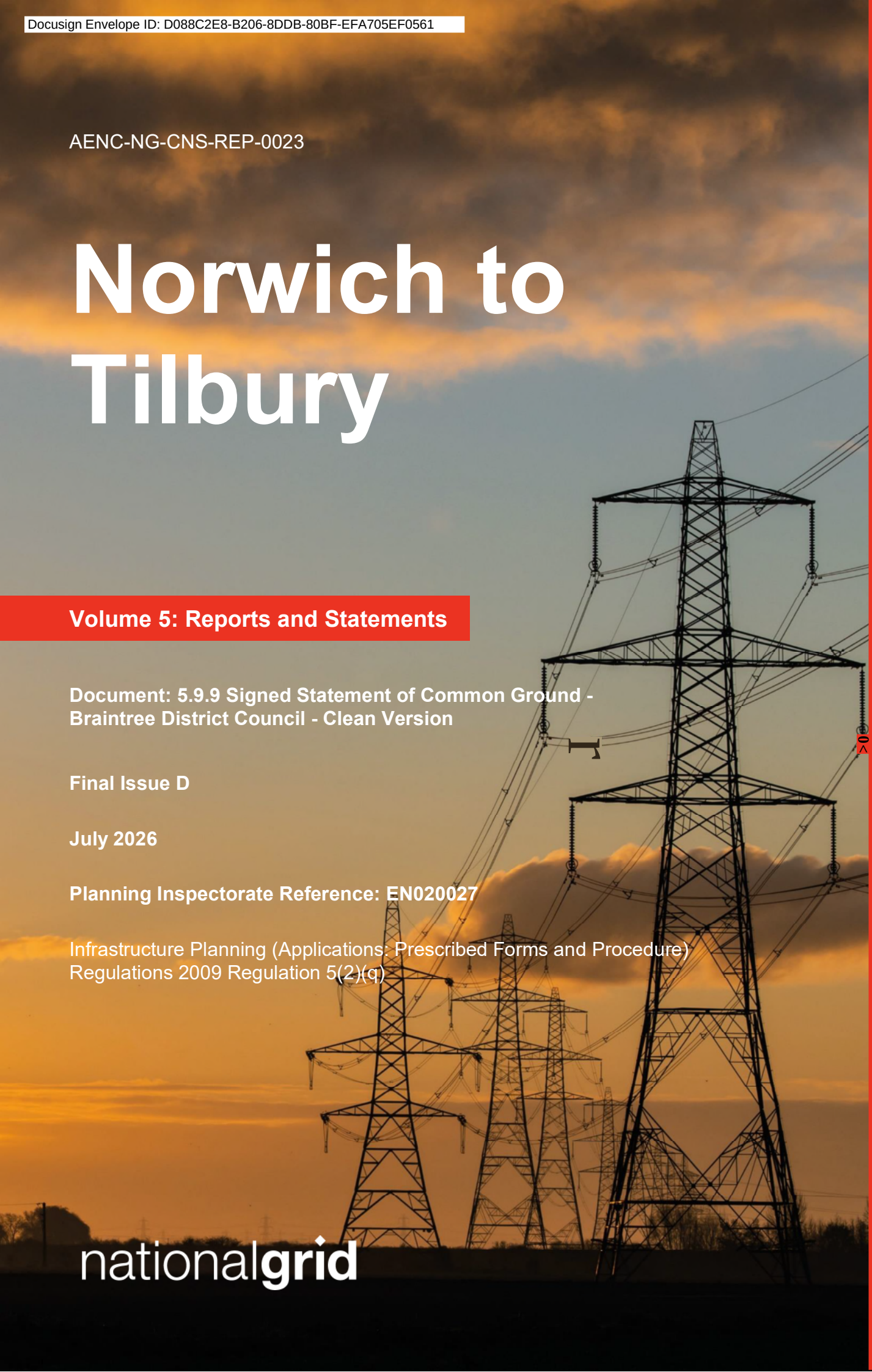

nationalgrid

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Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
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D	21 July 2026	Deadline 7

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1. Introduction

1.1 Overview

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

1.1.2 This SoCG has been prepared by National Grid as the Applicant and Braintree District Council (BDC). BDC is a prescribed consultee under Section 43 of the Planning Act 2008 (PA 2008) as a Host Authority.

1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents and submissions into the examination. All documents are available in the deposit locations and /or the Planning Inspectorate website.

1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties. It identifies areas of the Project within the Development Consent Order (DCO) application ('the Application'), where matters are agreed, under discussion or not agreed between the parties.

1.1.5 The engagement between the parties across the breadth of matters has been extensive and is summarised in Chapter 2..

1.1.6 This final SoCG has been prepared for deadline 7, in accordance with the Rule 8 letter **[PD-011]**.

1.1.7 The parties will continue to work together beyond deadline 7, seeking further resolution where appropriate.

1.1.8 This SoCG has been structured to reflect topics of the Application which are relevant to BDC. The applicable matters considered within this SoCG apply to BDC'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
- Contaminated Land, Geology and Hydrogeology Matters
- Socio-economics, Recreation and Tourism

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- 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		
3.2.11 – Community Benefits	BDC strongly encourage NGET to positively respond to the issue of social value and community benefits. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance.	Matter unlikely to be agreed during Examination, as this is a post-consent matter.
3.2.12 – Legal agreements	The Applicant will secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.	Discussions will conclude after finalisation of this SoCG through wording of the requirements.
3.2.13 – Landscape and visual compensation	National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests.	Discussions will conclude after finalisation of this SoCG through wording of the requirements.
Ecology and Biodiversity		
3.3.16 – Biodiversity Net Gain - offsite	BDC seeking further clarification around Offsite BNG provision. The Applicant maintains that offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.	The Applicant and BDC are committed to continue engagement which will likely conclude after finalisation of this SoCG.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
Agriculture and Soils		
3.6.5 – Key parameters and assumptions	BDC acknowledges the key parameters and assumptions set out in the ES; however, the Council does not agree that these provide a sufficiently reliable basis for assessing agricultural and soil impacts. The Applicant maintains that the key parameters and assumptions presented are considered appropriate.	Discussions will conclude after finalisation of this SoCG
3.6.6 – Baseline conditions and receptors	BDC does not agree that the baseline conditions and receptors for agriculture and soils have been characterised with sufficient confidence across the full extent of the Order Limits. The Applicant maintains that the baseline conditions and receptors presented are considered appropriate.	Discussions will conclude after finalisation of this SoCG
3.6.7 – Embedded mitigation 3.6.8 – Standard mitigation	BDC does not agree that the scope and methodology for standard or embedded mitigation is adequate. The Applicant maintains that the standard and embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects. The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.	Discussions will conclude after finalisation of this SoCG
3.6.9 – Additional mitigation	BDC notes the Applicant's position that no additional mitigation is required; however, the Council cannot agree this conclusion at this stage. The Applicant maintains that no additional mitigation measures are proposed to minimise effects, other than the measures for handling organic-rich (peaty) soils, which are already set out within the standard mitigation in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]. The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter under discussion	Deadline for resolution
3.6.10 – Construction effects 3.6.11 – Operational (and maintenance) effects	BDC considers the assessment of construction, operational (and maintenance) effects to be Under Discussion pending clarification and securing of the post-consent soil survey commitments and reinstatement requirements. The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.	Discussions will conclude after finalisation of this SoCG
3.6.12 – Outline CoCP	BDC acknowledges that the Outline Code of Construction Practice sets out soil handling and protection measures relevant to agriculture and soils. However, the Council cannot agree that the CoCP provides sufficient certainty at this stage. The Applicant is committed to undertake further post-consent soil surveys and notes that the scope, density and methodology of these surveys will be agreed with Natural England post-consent. The results will be used to inform the detailed Soil Resource Plan secured by Requirement 4.	Discussions will conclude after finalisation of this SoCG
Cumulative Effects		
3.12.5 – Key parameters and assumptions	BDC has concerns with these sections of both intra-project and inter-project assessments. The Applicant maintains that the methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Matter unlikely to be agreed during Examination.
3.12.12 – Outline CoCP	BDC has concerns with the methodology of these sections in both intra-project and inter-project assessments. The Applicant maintains that the methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Matter unlikely to be agreed during Examination.
Development Consent Order		
3.13.12 – Validation checklist	Both parties agreed that a validation checklist (or similar) could be helpful to improve the quality and consistency of submissions and assist in the efficient determination of applications to discharge Requirements. Discussions are	Discussions will conclude after finalisation of this SoCG

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	ongoing regarding the final content and operation of the checklist.	
3.13.13 – Compliance monitoring and enforcement	BDC considers that effective compliance monitoring, reporting and enforcement arrangements are an important component of the Project's environmental management framework. The Applicant considers that it is responsible for day-to-day compliance, including monitoring, audit trails and record keeping, whilst Local Planning Authorities retain their statutory powers as enforcing authorities to investigate potential breaches and take enforcement action where necessary.	Discussions will conclude after finalisation of this SoCG
Appendix A- DCO Wording	Discussions are ongoing in relation to detailed drafting points on: DCO Wording - Definition of "relevant planning authority"	Discussions will conclude after finalisation of this SoCG

1.3 Project Description

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

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

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- 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 BDC
- **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 National Grid has engaged with BDC 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 draft documentation at key stages

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

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and BDC.

2.2.2 It is agreed that the below is an accurate record of the key meetings and consultation undertaken between National Grid and BDC in relation to the issues addressed in this SoCG. BDC may use Essex Place Services to provide comments on certain topics. EPS are a consultancy service that provides advice on behalf of BDC, therefore where this is referenced throughout the document it should be taken as comment provided by the Council.

Table 2.1 Summary of Key Engagement between National Grid and Braintree District Council

Date	Format	Topic/description
General		
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.

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

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Date	Format	Topic/description
March 2025	Meeting	All host authority workshop
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline CoCP including Appendix H – Draft Greenhouse Gas Reduction strategy.
May 2025	Email Correspondence	National Grid shared the ES Appendix 17.1: Long List of Other Developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the traffic, transport and PRoW section of the Environmental Statement
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
June 2026	Meeting	Meeting to discuss the Statement of Common Ground in relation to Soils and Agriculture.
Ecology and Biodiversity		
July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from stakeholders.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.

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Date	Format	Topic/description
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
January 2025	Email Correspondence	National Grid shared the Biodiversity Net Gain Strategy.
January 2025	Email Correspondence	National Grid issued the Protected Species Proposed Mitigation Measures to stakeholders including BDC.
May 2025	Meeting	National Grid hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	National Grid 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	Joint meeting attended by LPA's who are represented by Essex Place Service for ecology to discuss the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss draft bat licences with Essex Place Services.
June 2026	Meeting	Meeting to discuss draft bat licences, ECoW and BNG with Essex Place Services.
Air Quality		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
Noise and Vibration		
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
January 2026	Meeting	Meeting to discuss the noise and vibration elements of the Statement of Common Ground.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground.

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

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Date	Format	Topic/description
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	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
June 2024	Meeting	Archaeology Working Group Meeting
August 2024	Meeting	Archaeology Working Group Meeting
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.
October 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	National Grid shared the setting survey locations with stakeholders.
December 2024	Meeting	Archaeology Working Group Meeting
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid shared the Heritage Viewpoints Documents with stakeholders.
February 2025	Email Correspondence	National Grid shared the Draft Heritage Baseline Report with stakeholders.
February 2025	Meeting	Thematic group meeting to further discussions regarding the Historic Environment Viewpoints.
February 2025	Meeting	Meeting to discuss the Draft Heritage Baseline Report.

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Date	Format	Topic/description
March 2025	Email Correspondence	National Grid issued updated the Historic Environment Viewpoints information to stakeholders including BDC.
April 2025	Email Correspondence	National Grid issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Email Correspondence	National Grid shared an Archaeological fieldwork summary for comment.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
August 2025	Email Correspondence	National Grid shared SSWSIs - Sites 012
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Email Correspondence	National Grid shared updated SSWSIs site 12
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
November 2025	Email Correspondence	National Grid shared shapefile for the phase 2 survey along with the priority area survey.
November 2025	Meeting	Archaeology Working Group Meeting
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email Correspondence	National Grid shared the WSI for the Phase 2 geophysical survey.
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss Essex Place Services (EPS) comments on the Statement of Common Ground
January 2026	Meeting	Meeting to discuss matters relating to Archaeology in the Statements of Common Ground being covered by EPS.
January 2026	Meeting	Meeting to discuss matters relating to Built Heritage in the Statements of Common Ground being covered by EPS.

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Date	Format	Topic/description
February 2026	Meeting	National Grid shared the Supplementary Environmental Information submitted to the Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group Meeting
March 2026	Meeting	Archaeology Working Group Meeting
April 2026	Meeting	Archaeology Working Group Meeting
June 2026	Meeting	Meeting with EPS Archaeology to discuss the Statement of Common Ground
June 2026	Meeting	Meeting with EPS Built Heritage to discuss the Statement of Common Ground
June	Meeting	Archaeology Working Group Meeting
July	Meeting	Archaeology Working Group Meeting
July	Email	Updated draft of Geoarchaeological monitoring of GI WSI Shared.
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	Thematic Group meeting – proposed viewpoint locations - Essex
April 2023	Meeting	National Grid 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	Meeting	EIA viewpoints meeting - Essex
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).

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Date	Format	Topic/description
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the development consent application.
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology.
March 2025	Email Correspondence	National Grid issued the draft Arboricultural Impact Assessment.
May 2025	Email Correspondence	National Grid shared the next iteration of the Outline LEMP including Appendix D – Outline Landscape Proposals.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
October 2025	Meeting	Further optional thematic group meeting to discuss feedback on the Landscape section of the Environmental Statement.
January 2026	Meeting	Joint meeting attended by LPA's who are represented by Essex Place service for Landscape to discuss the Statement of Common Ground.
February 2026	Meeting	Meeting to discuss the Landscape sections of the Statement of Common Ground.
March 2026	Email Correspondence	National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in BDC's Local Impact Report

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Date	Format	Topic/description
Socioeconomics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including BDC.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
September 2024	Technical Note	National Grid shared the Socio-economic, Recreation and Tourism technical note with stakeholders.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical Note on the ES Chapter.

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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 BDC 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 BDC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement Status for Matters Presented in Section 3

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

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

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

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3.2 Project Development, Description and Design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to Project Development, Description and Design Matters

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. For the Applicant's position on needs case and detailed response to the Hiorns Report, please refer to Section 3.2 'Needs Case and Timing' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. To summarise, the need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual. The Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative.	While BDC accept the overall needs case for network reinforcement (in principle) BDC does not agree that the Applicant has adequately demonstrated the need case for the Norwich to Tilbury project at this time. The Applicant has confirmed that no further evidence will be provided to justify the timing or scale of reinforcement required, despite significant uncertainty around the contracted generation assumed in the need case and the likelihood that many of these projects will connect by 2030. BDC notes that the Applicant has not addressed the findings of the Hiorns Report, which concludes that contracted generation volumes are unlikely to materialise as assumed and that reinforcement could potentially be deferred without constraining offshore wind delivery. In the absence of updated sensitivity testing, transparency on the status of contracted connections, or further justification on timing, BDC cannot yet support the asserted urgency or necessity of this specific reinforcement proposal.	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2.2	Project timing	Timing for the project is driven by the needs case - when offshore wind farms are contracted to connect to the UK network - the first of which are contracted to connect in 2030. The Applicant is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** To summarise, the need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual. The Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	BDC does not agree that the Applicant has demonstrated a sufficiently robust or transparent basis for the asserted 2030 delivery deadline. While BDC recognises National Grid's licence obligations, the Council remains concerned that the contracted connection dates underpinning the timing case have not been tested against the real-world readiness of those generation projects. Evidence referenced in the Examination, particularly the findings of the Hiorns Report, indicates significant uncertainty in whether generators will connect at the volume and pace assumed. This could materially affect both the urgency of reinforcement and the viability of alternative solutions. BDC therefore maintains that a further review of the contracted generation position and connection readiness is required in order to properly substantiate the timescale for Norwich to Tilbury.	Not Agreed
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line,	BDC does not agree that the submitted overhead line route represents the only, or the least-harm, strategic option. BDC considers that credible alternatives—specifically an offshore-	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives. For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives - Offshore Alternatives' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** With regard to the Hiorns Report, as set out under 3.2.1 Needs Case above, the Project is needed by 2030 - the Hiorns Report's 2035 conclusion is expressly rejected and delay does not provide a deliverable HVDC alternative. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	centred approach or High Voltage Direct Current (HVDC) undergrounding—should be fully explored, particularly if updated analysis shows that the contracted generation and delivery timescales are less acute than currently asserted. Evidence presented in the Examination, including the Hiorns Report, indicates significant uncertainty in the readiness and timing of contracted generation projects. If reinforcement is not required as urgently as the Applicant claims, this could materially improve the feasibility of alternatives that would substantially reduce the scale of onshore infrastructure across Braintree District and wider Essex. BDC therefore maintains that a transparent reassessment of route strategy is required before the onshore overhead line can be justified.	
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.	BDC does not agree that a predominantly overhead line route has been justified or that the Applicant has demonstrated that an overhead HVAC solution represents the least-harm or most appropriate option for this project. BDC acknowledges that ENi JS establishes a general expectation in favour of overhead lines,	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills. For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice - Overhead Line and Underground Cables' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	but notes that this presumption is not absolute, and that ENffi5 requires applicants to evidence that all feasible alternatives, including undergrounding and offshore options, have been robustly assessed in environmental, technical and cost terms. Based on the current evidence, BDC considers that the Applicant's appraisal of alternatives remains incomplete. The Council maintains that offshore-centred approaches and HVDC undergrounding remain credible strategic options, particularly given the significant and permanent landscape, visual, ecological, heritage and arboricultural impacts of the proposed overhead line within Braintree District. BDC also notes that uncertainty around the project's timing and contracted generation (as highlighted in the Hiorns Report) may materially affect the feasibility and deliverability of non-overhead alternatives. Accordingly, BDC's view is that the Applicant must undertake a more transparent and robust comparative assessment, including updated need-case sensitivity testing, before the overhead line route can be justified as the most appropriate option.	
Project development process - Design				
3.2.5	Design Principles	The primary design requirement for electricity infrastructure is that it must be safe and secure. These functional constraints, particularly around safety and operational	BDC agrees that good design must operate within functional and safety constraints, but considers that the Applicant has not demonstrated that the design process has	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		reliability, can significantly limit the Applicant's ability to adapt the aesthetic appearance of its infrastructure. Good design, even with the functional restrictions, is nonetheless achieved through careful consideration of the Holford Rules (relating to the connection routeing and siting), the Horlock Rules (relating to the siting of substations and similar cable sealing end compounds and line entries) and the environmental impact assessment process. These demonstrate the importance of balancing the inherent form and function of electricity transmission infrastructure with technical, economic and environmental considerations to reach reasonably practicable development proposals. While the overall design is largely fixed by necessity, smaller design details, such as the colour of finishes, are agreed upon and documented through the Development Consent Order process. Furthermore, NPS EN-1 encourages developers "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as	adequately responded to local character, place-specific sensitivities, or the opportunities for innovative mitigation required by EN01 and the Planning Inspectorate's Advice on Good Design. BDC notes that the proposed lattice pylon design and 50m overhead line solution would result in extensive, permanent and unavoidable landscape, visual and heritage harm, which indicates that the design process has not achieved a locally responsive outcome. BDC also considers that the Applicant has relied too heavily on the Holford and Horlock Rules without adequately addressing their limitations, particularly that they do not reflect modern landscape guidance, local distinctiveness, or updated national policy objectives. This concern is explicitly raised in BDC's alternatives assessment in ExQ1, where the use of Holford Rules is described as "unadopted and out of date." In BDC's view, good design for a project of this scale requires robust exploration of alternative technologies and forms, including innovative substation design, undergrounding, HVDC options and design-led solutions to minimise harm. Given the magnitude of local impacts, BDC considers that a more ambitious and locally responsive design approach is both possible and necessary to meet the expectations of EN01 and the Planning Inspectorate's design advice.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		possible" within the bounds of functional and safety constraints. The Planning Inspectorate Good Design advice advises that 'Good design is not primarily about how infrastructure looks, although these considerations (the aesthetics) are important'. EN-1 refers to the importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the projects evolution and delivering sustainability is set out in the Design and Access Statement (document reference 7.15). For the Applicant's position on Design principles, please refer to Section 3.9 'Good Design' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030],** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	BDC therefore maintains that National Grid must demonstrate a fuller, more place-sensitive and iterative design process, exploring opportunities for innovation and reduction of harm while ensuring safety and functionality.	
3.2.6	Pylon Route by Rivenhall Place	Noting the concerns of BDC and following feedback from the public, together with the results of environmental surveys, amendments have been made to the proposed project design and associated Limits of Deviation in this location to enable the retention of the tree known locally as "Henry". The Applicant will work with the Main Works Contractor through detailed design to ensure the protection of the tree's Root Protection Area.	BDC welcomes the design amendment that would enable the retention of the veteran oak known locally as "Henry" (T820). However, BDC remains concerned that the current Limits of Deviation could still permit the authorised infrastructure to be moved closer to the tree than is currently proposed. To ensure the tree's long-term protection, BDC considers that the alignment in this location should either be fixed through GG34 of the	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Regarding Requirement 8, the **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B],** the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** include the commitment to produce an Arboricultural Method Statement (AMS) (with a tree protection plan (TPP)) to be agreed with the LPAs prior to construction work commencing. The AMS and TPP will ensure that the Root Protection Area is protected during construction through the implementation of Construction Exclusion Zones (CEZ) and ongoing arboricultural supervision. Therefore, an additional restriction in GG34 is not required.	CoCP or that the Limits of Deviation should be reduced so that no part of the authorised development can encroach further into the tree's Root Protection Area. BDC notes the Applicant's commitment to prepare an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) for approval at the discharge of requirements stage. Whilst these documents would provide important construction-phase protection measures, they do not guarantee the retention of the tree should design changes, including any repositioning of the , / ..... e authorised Limits of Deviation, result in a greater encroachment into the Root Protection Area. BDC therefore considers that protection should be secured through the authorised design parameters themselves rather than relying solely on post-consent mitigation measures. BDC further notes that, in the absence of a detailed Arboricultural Method Statement, Tree Protection Plan and sufficient information demonstrating how works can be undertaken within proximity to the tree's Root Protection Area, the Council is not satisfied that the long-term retention of the tree has been demonstrated. Given the veteran status of "Henry" (T820), BDC considers that a VetCert-qualified arboricultural consultant should be involved in the preparation of the Arboricultural Method	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			Statement and associated protection measures to ensure that the particular sensitivities of a veteran tree are fully considered. BDC would also expect draft versions of the Arboricultural Method Statement and Tree Protection Plan to be made available to the local planning authority prior to the submission of the final documents for approval, in order to provide confidence that the proposed protection measures are capable of securing the tree's long-term retention.	
Project development process - Consultation				
3.2.7	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.	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.8	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 published Consultation Strategy.	BDC have no evidence to suggest that the non-statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2.9	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 are contained within the **5.1 Consultation Report [APP-066].** The statutory consultation was undertaken in accordance with the published SoCC.	BDC have no evidence to suggest that the statutory consultation was not undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.10	2025 targeted consultation	Targeted consultations for Essex took place from 25 February 2025 - 27 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within **5.1 Consultation Report [APP-066].** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).	BDC has no evidence to suggest that the targeted consultation was not undertaken in accordance with the published Consultation Strategy. However, the Council considers that some changes identified by National Grid as non-material may nevertheless have had a locally significant effect on nearby residents and communities. BDC's view is that these changes would have benefited from wider consultation to provide affected parties with an opportunity to comment. Whilst the Council accepts that the targeted consultation met the relevant procedural requirements, it maintains that a broader approach to consultation on certain non-material changes would have been preferable.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
Other matters as required				
3.2.11	Community Benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. The Applicant will begin consulting in July 2026 on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent and construction starting. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits.	BDC does not agree that the socio-economic impacts of the Project are negligible. As set out in the Local Impact Report, BDC considers that Norwich to Tilbury would give rise to extensive and long-term residual impacts on the local environment, landscape, wellbeing, and the wider community which cannot be fully mitigated or compensated through the planning or DCO framework. The Council therefore maintains that the national benefits of the project do not offset the scale of harm that would be borne locally. BDC strongly encourages National Grid to engage proactively and transparently with host authorities on the development of community benefit mechanisms, in line with the Government's Community Funds for Transmission Infrastructure guidance (DESNZ, 2025). While acknowledging that such benefits fall outside the DCO process, BDC considers the establishment of a substantial, place-specific community benefits package essential to address the significant residual effects on communities within Braintree District and the wider Essex area. The Council therefore expects National Grid to commit to collaborative engagement to secure meaningful investment and long-term positive outcomes for affected communities.	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			BDC note that the Applicant is committed to providing community benefits, however the legal mechanism to ensure that this is delivered is still unclear.	
3.2 12	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 [Revision B].** 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 BDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BDC welcome the commitment to secure BNG and off-site tree planting via requirement. Wording of the requirements is still under discussion between the parties at the time of finalising this SOCG.	Under discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.2 13	Landscape and visual Compensation	As explained by Counsel for National Grid at ISH4, National Grid is also proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in **8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [Revision A],** should the Secretary of State consider the measures necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with BDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BDC support the position of Essex County Council on matters regarding the commitment to secure landscape compensation/offsetting measures. BDC understand these discussions are still ongoing.	Under discussion

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3.3 Ecology and Biodiversity

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The ES has identified the relevant legislation, policy and guidance. BDC confirmed in call regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
EIA - Approach and Methods				
3.3.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 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 (ecology, not arboriculture)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving	Sufficient desktop data has been collected for the ES. As for the survey data, circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		coverage of 97% of the Order Limits. The Applicant has agreed a bat box compensation strategy to resolve this issue, wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**	in the dataset is anticipated to be provided in November 2025; ECC position pending. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to bat survey data which requires further information and is noted in ID3.3.18. 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.	
3.3.4	Assessment Methodology (ecology, not arboriculture)	The assessment methodology was agreed through **6.19 Scoping Report [APP-288-APP-296]** and the **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology (ecology, not arboriculture)	The Applicant issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species have been agreed with Natural England. The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**	The survey methods used are largely accepted, although note the comments made for ID3.3.19. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to survey methodology for bats which requires further information. 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.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of **6.8**	BDC does not agree that the parameters and assumptions relating to habitat reinstatement and long-term ecological outcomes are	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]. The key parameters and assumptions presented are considered appropriate. The Applicant has included within the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** the commitment to a five-year monitoring period for tree and hedgerow replacement planting. Five years is considered sufficient to ensure successful establishment and is in line with other recent NSIP projects. Most planting failures happen within the first few years, and the five-year period captures this initial establishment risk and by year 5 provides a realistic picture of long-term success. It is considered that the early establishment can be a key determinant to later success. The monitoring period is adaptive, as stated within the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which includes like for like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure. The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which can be more determinative than the length of aftercare alone. **7.4 Outline Landscape and Ecological and Management Plan [Revision G]** has highlighted some good practice	sufficiently robust. While the assumptions listed in ES Section 8.4 are acknowledged, BDC considers the ES assumption that habitat removed during construction "would be reinstated" within a five-year establishment period to be overly optimistic and unsupported by evidence. This concern is reflected throughout the Council's ecological submissions, including the LIR (REP1-148) and relevant Deadline responses. BDC's view, informed by its ecologist, is that a five-year reinstatement and monitoring period is not sufficient to ensure comprehensive or reliable reinstatement success across a construction corridor of this scale, especially given: • the extensive vegetation removal required; • the diversity of habitat types affected; • the risk of partial or complete reinstatement failure; and • the ongoing operational vegetation-height restrictions along the corridor. BDC notes that the Outline LEMP's five-year period is significantly shorter than the ecological recovery timescales relevant to woodland edge, hedgerow, riparian and mixed rural habitats. The LIR highlights that predicted ecological impacts may be understated because the ES assumes successful reinstatement, whereas long-term failure is a material risk. BDC therefore considers that:	I ~~MMH~~ HH|| ~~MMM~~ HHH HHH HSSH HHH HH||

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		principles, and these will be expanded upon with full details provided within the final Landscape and Ecological Management Plan to be discharged in accordance with Requirement 4 of **3.1 Draft Development Consent Order [REP5-060]. 7.4 Outline Landscape and Ecological Management Plan [Revision G]** also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. After this five-year aftercare period, the planting would be managed by the relevant landowner, as currently takes place in respect of the existing planting on private land. The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [Revision B].** National Grid is pursuing a mechanism to secure the delivery and maintenance of any offsite tree planting provision required as a result of the commitment to replace individual trees at a ratio of 3:1. National Grid is continuing discussions on this matter with the host authorities. The Applicant considers that the ecology and biodiversity assessment is robust, proportionate and based on appropriate and clearly defined assumptions. The approach to planting, monitoring and management reflects established best practice for projects of this scale, with a strong emphasis on early	• A longer monitoring and management period is required for reinstatement areas outside Environmerital Areas (e.g., 10 years minimum), or • A mutually agreed replacement-failure percentage must be factored into compensation calculations to avoid over-reliance on assumed short-term recovery. These concerns were raised at the SoCG meeting in January 2026 and remain under review. BDC's ecologist has confirmed that they are not convinced a five-year management period will ensure successful habitat reinstatement and wishes this view to be formally recorded. Accordingly, BDC maintains that the Applicant's key ecological assumptions, particularly those relating to reinstatement and recovery within five years, cannot be agreed without strengthened monitoring, management and compensation commitments.	

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		establishment, adaptive management and high-quality implementation. The five-year aftercare period is both standard and sufficient to secure successful establishment, supplemented by longer-term 30-year commitments for Environmerital Areas. Secured through the draft DCO, these measures provide a clear, flexible and deliverable framework that ensures mitigation is effectively implemented, monitored and adjusted over time to achieve the intended outcomes. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Baseline Conditions				
3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season was submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. The scope of baseline surveys for European protected species surveys (including for roosting bats) was agreed in advance with	Circa 12.5% of the Order Limits are still undergoing ecological survey. There are also certain protected species surveys where the results are more incomplete (for otter and water vole only 65% reported; see also ES Chapter 8, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025; ECC position pending. Note also the comments made for ID 3.3.5. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed for all areas apart from in relation to baseline	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Natural England. The survey data collected is sufficient to inform a robust ecological impact assessment as set out within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G],**	conditions and receptors for bats which requires further information and set out in ID3.3.20. 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.	
EIA - Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C],** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The embedded mitigation measures set out in Section 8.6 of the ES are acknowledged and appreciated. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.9	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The Summary of Proposed Protected Species Mitigation, Outline CoCP, and Outline LEMP documents have been shared with BDC. BDC review expressed no major concerns but did advise a number of clarifications and additions to those documents. BDC confirmed in meeting regarding the Statement of Common Ground in 14 January 2026 that this matter is considered agreed for all areas apart from in relation to standard	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		The suggested clarifications on standard mitigation from BDC have been included within **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** provided with the application. Mitigation for roosting bats is being agreed with Natural England as part of the draft licence process. The Applicant has agreed a bat box compensation strategy to resolve this issue, wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**	mitigation for bats which requires further information (see ID3.3.21). 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.	
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	See above comments regarding habitat reinstatement (ID 3.3.6) and protected species derogation licensing (ID 3.3.9). BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
EIA - Assessment Conclusions				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The assessment of effects during construction presented is considered appropriate.	BDC notes that, following discussions with the Applicant and its ecological advisors, agreement has been reached regarding the approach to bat roost compensation. BDC welcomes the Applicant's commitment to provide compensation not only for confirmed bat roosts but also for the loss of trees	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Tables 8.23 and 8.24 within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** do not restate a specific timeframe for residual effects because the duration of impacts has already been assessed and defined within the magnitude assessment using the agreed categories of short term (up to 1 year), medium term (1-10 years) and long term (greater than 10 years). Duration, along with other magnitude components, is fully considered and described in the earlier stages of the assessment, where it informs the evaluation of unmitigated effects. This approach reflects standard EIA practice, in which the residual effects section presents the final significance outcome, with the underlying factors—such as duration—embedded within the earlier magnitude assessment rather than restated. The survey approach to bat roost surveys has been agreed with Natural England (the statutory responsible body for bats) and is considered a pragmatic approach to a project of this scale. Full aerial/emergence surveys will be undertaken on trees due to be lost during detailed design. Any roost affected will be covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has agreed a bat box compensation strategy, the wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline**	containing potential roost features (PRF-I and PRF-M), through the provision of bat boxes and/or veteranisation of retained trees. Subject to the inclusion within the Deadline 6 Outline Landscape and Ecological Management Plan of the agreed bat compensation measures, including a commitment to provide compensation features equivalent to 10% of the total number of trees with potential roost features to be removed, BDC considers this matter resolved.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Landscape and Ecological Management [Revision G]. This includes the provision of bat boxes/veteranisation of 10 % of the bat roosting features lost.		
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) is considered appropriate. BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and is appropriate for managing construction impacts from the Project. Full details of the ECoWs 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 3 years relevant post-graduate experience in ecological supervision of construction works;	Following discussions with the Applicant, BDC is satisfied in principle with the proposed Ecological Clerk of Works (ECoW) approach, including the use of appropriately qualified specialists for species-specific tasks and the establishment of a project-wide ecological management structure. BDC's agreement is subject to the Deadline 6 versions of the Outline Code of Construction Practice and Outline Landscape and Ecological Management Plan including a commitment that the Ecology Working Group will have an opportunity to review the proposed ECoW structure and the qualifications and experience of key ecological personnel prior to appointment. Subject to the inclusion of this commitment, BDC considers this matter resolved.	Agreed

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		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 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 is included in the Applicants response to BIO 1.26 in **8.9.1 Applicant's Response to First Written Questions [REP3-074].** Additional wording has been added to **7.4 Outline Landscape and Ecological Management Plan [Revision G]** at Deadline 6 to confirm that the Ecology Working group can review the ECoW structure and key individuals qualifications.		
3.3.14	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental**	Following discussions with the Applicant regarding bat roost compensation and the management of potential roosting features, BDC is satisfied that the proposed provisions within the revised Outline Landscape and	Agreed

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		Statement Chapter 8 - Ecology and Biodiversity [Revision C] and is appropriate. Natural England (the statutory responsible body for bats) have approved the method to classify potential roost features which are in line with standard guidelines. A risk-based approach has been taken when assessing trees for their hibernation potential for bats. While some features assessed as PRF-I or PRF-M may allow individual bats to hibernate for very short periods of time, only tree features where the PRF is highly likely to provide constant cool, stable and humid conditions, and therefore a higher likelihood of being used for longer periods of time, have been highlighted as having hibernation potential. For a project of such a large scale, to assume hibernation for all trees with any PRF is not reasonable and not realistic to apply appropriate and effective mitigation while ensuring project feasibility. The approach to mitigation involves all trees with PRFs that will be unavoidably impacted will undergo an updated Ground Level Tree Assessment (GLTA) survey and aerial / emergence surveys, during which time the potential of each feature can be re-assessed for its suitability for hibernation using the same assessment as outlined above. The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with	Ecological Management Plan will provide an appropriate framework for compensating for the loss of potential bat roosting habitat. Subject to the agreed bat compensation provisions being incorporated into the Deadline 6 Outline Landscape and Ecological Management Plan, BDC considers this matter resolved.	

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		Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**		
Other matters as required				
3.3.15	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 [Revision B]** sets out the approach to BNG. The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025. The approach to BNG applied to the Project and the scope of onsite mitigation is agreed by both parties.	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is considered agreed.	Agreed
3.3.16	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 [Revision B]** sets out the approach to BNG. Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain Report [Revision B],** the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat	BDC confirmed in meeting regarding the Statement of Common Ground in January 2026 that this matter is still under discussion, and that further clarification is sought around Offsite BNG. BDC 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

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		condition, cost and timings amongst others, including the local nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances. Updates were made to section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to reflect this. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers post-consent. A draft S106 Unilateral Undertaking was originally shared with the local authorities (May 2026) which included further details on how the offsite BNG measures will be delivered and secured. Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, by requirement and not by a unilateral s106 agreement The Applicant is committed to continue discussions with BDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.3.17	Arboricultural Impact Assessment (AIA)	**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]** has been prepared in	BDC does not agree that the Arboricultural Impact Assessment (APP-236) (or as updated) provides a sufficiently robust or complete	Not Agreed

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		accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and is considered appropriate. The Applicant notes that BS5837 is a guidance document therefore compliance is not a requirement for this development consent application. **6.19 Scoping Report [APP-288 to APP-296]** highlights that there is deviation from the British Standard in terms of surveying Low value (C grade trees) and explained how these would be reported on (baseline data using canopy area and a 5 m root protection area applied to the canopy spread). This reference to the need for an Arboricultural Method Statement (AMS) to be produced (with a tree protection plan) and to be agreed with the LPAs prior to construction work commencing can be found in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B], 7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G].** The Applicant does not propose any further tree surveys during the pre-consent period. Paragraph **8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms that, following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of	evidence base to assess arboricultural impacts or to support the conclusions relied upon in the Environmental Statement. As set out in the LIR and reiterated in subsequent deadline submissions, the AIA does not comply with key BS5837:2012 parameters, including the requirement to survey and sequentially number all trees within (and adjacent to) the survey area. The omission or under-recording of trees, particularly Category C trees, which nevertheless have material environmental and amenity value in a rural landscape, significantly limits the Council's confidence in the accuracy of the baseline and the reliability of impact predictions. BDC also remains concerned that the AIA lacks the level of detail normally expected for a NSIP of this scale. The assessment does not provide a complete or clearly cross-referenced inventory of affected trees; nor does it include a draft Arboricultural Method Statement or Tree Protection Plan, both of which are essential to determine whether the proposed works, particularly those within or adjacent to Root Protection Areas, can be delivered without causing unacceptable harm. These concerns were highlighted in BDC's written SoCG feedback (21 December 2025) and remain unresolved. The Council's Tree Officer has confirmed that "the level of detail…is insufficient to allow a thorough review" and that repeated requests for	

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		trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [Revision G]. The Applicant considers that **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]** is robust, proportionate and appropriate for this stage, having been prepared in accordance with the agreed scoping framework and clearly documented methodology. Commitments to further survey, refinement and protection measures through the Arboricultural Method Statement and detailed design stage, secured via **3.1 draft DCO [Revision G],** ensure that impacts will be minimised and managed effectively. Taken together, this provides a clear, consistent and deliverable framework for arboricultural management, with no requirement for additional pre-consent survey work. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	essential survey information have not been addressed. Until an AIA consistent with BS5837 principles—with complete tree data, clearly identified RPAs, and draft AMS/TPP documents—is provided, BDC cannot accept the AIA findings or agree that arboricultural impacts are fully understood or appropriately mitigated. Accordingly, BDC maintains that the AIA is inadequate and cannot be relied upon, and that strengthened, secured DCO requirements, mirroring the detailed provisions requested in Requirement 8, are necessary to ensure tree protection and to prevent avoidable or excessive arboricultural loss. BDC notes that this concern remains unresolved following review of subsequent Examination submissions. The Council's Tree Officer remains of the view that insufficient arboricultural information has been provided to demonstrate that retained trees can be protected in practice, that works within Root Protection Areas are achievable without unacceptable harm, or that the proposed retention strategy can be successfully delivered. BDC remains concerned that reliance on post-consent submissions, including an Arboricultural Method Statement and Tree Protection Plan, does not provide sufficient certainty at Examination stage regarding the extent of tree loss, impacts on retained trees, or the deliverability of mitigation measures.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.3.18	Datasources (bats)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**	Following review of the survey information provided and subsequent discussions with the Applicant, BDC is satisfied that sufficient survey data has been collected to support the assessment and proposed bat mitigation strategy. BDC considers this matter resolved.	Agreed
3.3.19	Survey Methodology (Bats)	The Applicant issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species have been agreed with Natural England. No further bat roosting surveys are being undertaken. 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. In line with the requirements of The Conservation of Habitats and Species Regulations 2017, bat roosting surveys have been undertaken and further pre-commencement surveys will be completed post-consent. Any roost affected will be	Following discussions with the Applicant and the agreement of additional compensation measures for the loss of potential bat roost features, BDC no longer seeks further pre-consent bat roost surveys. BDC accepts the proposed survey and licensing strategy, including the use of further detailed surveys during the detailed design stage and implementation through the project-wide licensing approach. BDC considers this matter resolved.	Agreed

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		covered under a Natural England licence following pre-agreed mitigation measures. The Applicant has agreed a bat box compensation strategy to resolve this issue wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**		
3.3.20	Baseline conditions and receptors (Bats)	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The baseline conditions and receptors presented are considered appropriate. 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 been working closely with Natural England to produce a draft project wide bat licence. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination. Applicant has agreed a bat box compensation strategy to resolve this issue wording for	Having reviewed the information provided by the Applicant and the agreed approach to mitigation and compensation, BDC is satisfied that the baseline information is adequate to inform the assessment of effects on bats and the associated licensing strategy. BDC considers this matter resolved.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G].**		
3.3.21	Standard mitigation (Bats)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The mitigation 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 agreed a bat box compensation strategy, the wording for which had been agreed with Braintree District Council and has been added to **7.4 Outline Landscape and Ecological Management [Revision G],** This includes the provision of bat boxes/veteranisation of 10 % of the potential bat roosting features lost.	Following discussions with the Applicant, BDC welcomes the commitment to provide bat roost compensation for the loss of potential roost features, including where no bat roost has been identified but removal of PRF-I or PRF-M trees is required. BDC notes the commitment to provide bat boxes and/or veteranisation of retained trees equivalent to 10% of the total number of trees with potential roost features to be removed across the Project, together with appropriate siting, installation and management measures secured through the Outline Landscape and Ecological Management Plan. Subject to these provisions being incorporated into the revised Outline Landscape and Ecological Management Plan, BDC considers the proposed mitigation and compensation measures acceptable.	Agreed

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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	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Acceptable,	Agreed
EIA - Approach and Methods				
3.4.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** Whilst the geographic extent of the study is noted, the use of data from a single meteorological station is considered to be proportionate given the low predicted pollutant	BDC raised the following comments in their relevant representations dated 27th November 2025: • Meteorological input data has been obtained for 2023 for a single recording station (Stansted Airport). Due to the length of the project route, it is likely that no single recording station would be representative of the whole study area and thus	Agreed

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		concentrations and low risk of causing air quality objective exceedances, as noted by the council. Any change or addition of meteorological data sites is not considered to materially affect the conclusions of the study.	representative stations could be selected based on locality for example, section E (Braintree District Council) may be better represented by data from Andrewsfield Recording Station which is located further east than Stansted. It is noted however (and the Council are prepared to concede) that given that the assessment results are well below the objective levels, it is unlikely that this would change the overall conclusions of the assessment even if it did result in minor changes to the reported concentrations.	
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
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 [Revision B].** The key parameters and assumptions presented are considered appropriate.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to key parameters and assumptions	Agreed
EIA - Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** The baseline conditions and receptors presented are considered appropriate.	BDC raised the following comments in their Relevant Representation dated 27th November 2025: • Baseline conditions throughout the study area are reported to be good, with concentrations of NO2, PM10 and PM2.5	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
			well below the relevant objectives/target values.	
EIA - Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B],** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to embedded mitigation.	Agreed
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 [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant notes that agreement with BDC on this matter is contingent on the proposed mitigation being fully implemented, which it intends to do.	BDC raised the following comments in their Relevant Representation dated 27 November 2025: • There are some predicted significant dust impacts in the absence of site specific mitigation. However, the residual impacts following the implementation of mitigation at high-risk sites is expected to be not significant. This is agreed but is contingent on the proposed mitigation being fully implemented.	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 [Revision B],** Additional mitigation is considered appropriate and adequate,	No comments raised in the BDC relevant representations or through review of the Statement of Common Ground for Air Quality in relation to standard mitigation.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		in terms of its nature and scale, to address potential effects.		
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 [Revision B].** The assessment of effects during construction presented is considered appropriate.	Braintree District Council raised the following comments in their Relevant Representation dated 27th November 2025: • The ES assessment assumes that construction dust effects would occur across the full extent of the Order Limits. Likewise, it is assumed where there is uncertainty regarding the scale of earthworks that a 'large' magnitude applies. These are a worst-case approach but are considered appropriate in the circumstances to reduce uncertainty and capture the fullest possible extent of impacts.	Agreed
3.4.11	Operational (and maintenance) effects	An assessment of operational and maintenance effects was screened out in 6.19 Scoping Report [APP-296] and was agreed within 6.20 Scoping Opinion [APP-297].	No comments raised in the BDC Relevant Representation or through review of the Statement of Common Ground for Air Quality in relation to operational effects.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	Section 7.6 of the air quality assessment in **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** discusses proposed mitigation. The chapter cross references to **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D].** Both of	BDC raised the following comments in their Relevant Representation dated 27 November 2025: • It is recognised that there is some uncertainty regarding Nonroad Mobile Machinery (NRMM) emissions associated with the project; the proposed mitigation measures appear appropriate although their	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		these documents provide further clarification and alignment on the mitigation proposed in the Environmental Statement, including emissions standards for NRMM and the siting of generators which are a subset of NRMM. **7.2 Outline Code of Construction Practice Appendix D Outline Dust Management Plan [Revision D]** outlines mitigation measures to minimise emissions from NRMM with commitments set out in Annex A of the document. Paragraph A.1.7 confirms that the Project will be carried out in accordance with legislation relevant to generators. Reference to being in accordance with legislation is not included within **7.2 Outline Code of Construction Practice [Revision G]** at AQ02, however, GG19 states that *'Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for vehicle type which will be defined in the CoCP.'* It then goes on to list potential, appropriate standards, including those for NRMM. NRMM, in particular heavy construction plant is expected to move around within the Draft Order Limits to facilitate construction of the Project. The use of construction NRMM with suitable controls and site management is unlikely to result in significant effects on local air quality according to the guidance from Local Air Quality	likely effect cannot be quantified. The Council have previously suggested that mention could be made of siting of Nonroad Mobile Machinery (NRMM) and ensuring it is compliant with emissions regulations within the Outline Code of Construction Practice (OCoCP). This however has not been implemented, and it is suggested the OCoCP is updated to include this. Notably it is included in the Dust Management Plan (DMP). The Council would recommend that section AQ02 in the OCoCP be amended for consistency across related documents	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Management - Technical Guidance (TG22)[1] Paragraph 7.30 (Department of Environment Food and Rural Affairs (Defra), 2022). Additionally, commitment AQ01 of **7.2 Outline Code of Construction Practice [Revision G]** includes the following "*Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as practical or possible.*" It is considered that commitment GG19 governing emission standards and this response explaining siting of generators addresses the concerns expressed by the Local Planning Authority and that the Applicant's documents already reflect the outcome the Local Planning Authority is seeking through its request.		

[1] Defra 2025 Local Air Quality Management Technical Guidance (TG22) Available at: https://laqm.defra.gov.Uk/wp-content/uploads/2021/03/LAQM-TG22-May-25-v2.l.pdf. Accessed: March 2026.

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3.5 Contaminated Land, Geology and Hydrogeology Matters

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 9.2 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The relevant policy context, legislation and guidance has been presented within the ES.	Agreed
EIA - Approach and Methods				
3.5.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The Study Area used within the ES is in accordance with that agreed within the Scoping Report and Scoping Opinion.	Agreed
3.5.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The list within paragraph 9.4.2 in **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology**	• BDC summarise the following comments from their relevant reps from November 2025:A review of the Contaminated Land Geology and Hydrogeology ES Chapter [APP-181] Section 9.4.2 did not identify a	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		[Revision B] states the sources of information used to inform the baseline assessment, which include georeferenced historical Ordnance Survey maps from the National Library of Scotland and historical Ordnance Survey maps from Envirocheck reports generally for areas of anticipated undergrounding. This is also included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [Revision B]. 6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [Revision B]** describes the various sources of information used to inform the assessment for all sections of the Project (including that parts of the Project under Braintree District Council's jurisdiction). The Envirocheck reports were obtained to provide additional information in areas of significant undergrounding/ trenchless crossings and therefore they do not cover Section E (Braintree). The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over	reference to the source(s) of information utilised to identify potentially contaminative previous land uses, although reference to NLS mapping is included in the Bibliography of the ES chapter. However, Section 9.1.6 of the accompanying Baseline Information and Preliminary Contamination Risk Assessment [APP-182] does make reference to historical Ordnance Survey maps from Envirocheck reports as sources of information but for 'parts of the route' only. The baseline condition data sources require further clarity. Although BDC would generally agree with the low risk rating awarded to all identified sources of contamination within Section 5 of the site, further details of the specific information upon which the various low risk ratings were based is requested. Information on how the baseline conditions relating to Unexploded Ordnance (UXO) have been identified is required.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).		
3.5.4	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The methodology used within the ES is in line with the approach presented within the Scoping Report.	Agreed
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The key parameters and assumptions presented are considered appropriate.	BDC does not have any comments specifically on the key parameters and assumptions presented within the ES.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The baseline conditions and receptors presented are considered appropriate.	BDC does not have any comments specifically on the baseline conditions and receptors within the ES.	Agreed
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 Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC does not have any comments specifically on the embedded mitigation presented within the ES.	Agreed
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]** and set out in the **7.2 Outline Code of Construction Practice [Revision G],** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC does not have any comments specifically on the standard mitigation measures presented within the ES.	Agreed
3.5.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].**	The ES report states that over and above the embedded and standard mitigation measures, no additional mitigation measures are necessary.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC has no comments on additional mitigation,	
EIA - Assessment Conclusions				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The assessment of effects during construction presented is considered appropriate. The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed	BDC's only outstanding comment about construction effects is that UXO is mentioned only in relation to embedded mitigation. Clarification on the Applicant's approach to assessing and managing the construction phase UXO risk has been provided.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		during construction activities by the Main Works Contractor(s).		
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	BDC does not have any further comments with regards to operational effects within the ES.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]** and is appropriate for managing construction impacts from the Project. Commitment GH10 describes that the results of risk assessments undertaken in accordance with LC:RM will be discussed with the LPA and EA, and any mitigation or remediation considered necessary will be agreed with the LPA and EA. Commitment GH08 that relates to a protocol for dealing with any unexpected contamination includes for provision of a policy describing how notifications and approvals will be agreed with the LPA. The Applicant can confirm that the updated version of **7.2 Outline Code of Construction Practice [Revision G]** submitted at Deadline 4 captures the matters raised by BDC regarding approvals, notifications and escalation in measure GH08.	BDC welcomes the amendments made to commitment GH08 within Revision D of the Outline Code of Construction Practice (REP4-164). The Council is satisfied that the updated wording appropriately captures the matters previously raised regarding local planning authority approvals, notifications and escalation procedures in relation to contaminated land, geology and hydrogeology matters. On the basis of the amendments secured within GH08, BDC considers this matter resolved.	Agreed

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3.6 Agriculture and Soils

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Agriculture and Soils

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered in the assessment of Agriculture and Soils are noted in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 6.2 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B].** All relevant legislation, policy and guidance have been identified and appropriately considered to inform the Agriculture and Soils assessment.	BDC agrees that the relevant national and local policy, legislation and guidance relating to agriculture and soils have been correctly identified in the ES. The Council notes, however, that compliance with this policy framework depends on the adequacy of baseline data, survey methodology, and the robustness of the mitigation and reinstatement commitments secured through the DCO. As set out in the Council's Local Impact Report, Deadline 3 response and ExQ1 submissions, these matters remain under discussion and are addressed in subsequent SoCG items.	Agreed
EIA - Approach and Methods				
3.6.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources	Sufficient survey data, including a detailed Agricultural Land Classification (ALC) survey and supporting predictive ALC grading, has been collected to inform the assessment as presented within Section 6.4 of **6.6 Environmental**	BDC are now satisfied that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post consent pre-construction.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Statement Chapter 6 - Agriculture and Soils [Revision B]. As presented in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [Revision B]** and **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B],** predictive Agricultural Land Classification (ALC) mapping was undertaken on a 100 m grid across the entire Order Limits, including points where auger surveys had been undertaken. This approach allowed for predictive ALC grading in areas where detailed surveys were not possible, as well as analysis of the accuracy of the predictions (comparing predictive grades against surveyed grades). ALC surveys were undertaken within the Order Limits, along the central alignment; out of a total of 1,877 survey points, 1,011 comprise detailed site surveys and 866 comprise a predictive assessment. Figure A6.1.1 Detailed Agricultural Land Classification within **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [Revision B]** included an error whereby the surveyed ALC grades were not visible on the ALC map. As a result, it appeared that the final ALC mapping units were derived solely from the predictive model, which was not the case. The ALC mapping units were informed by both survey data and predictive modelling. This error has been corrected, and Figure A6.1.1 Detailed Agricultural Land Classification has been		

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		updated in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report Figure A6.1.1 - Detailed Agricultural Land Classification (ALC) [REP1-062].** The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. Existing ALC maps would be updated to include the new information and provide a full baseline dataset. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D],** To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design.		
3.6.4	Assessment methodology	The assessment methodology was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.6.5	Key parameters and assumptions	Key parameters and assumptions made with regards to Agriculture and Soils are summarised in Section 6.4 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B],** The key parameters and assumptions presented are considered appropriate. **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]** details the total extent of the Order Limits as 3,755 ha. It was calculated that 3,461 ha of agricultural land would be temporarily removed from agricultural production during construction, while a further 203.1 ha would be lost permanently during operation (including 172.7 ha which is Best and Most Versatile (BMV) agricultural land); the remainder of the Order Limits comprises urban and non-agricultural land. The Applicant can confirm that the permanent loss of agricultural land has not been included within the assessment of temporary land loss. As stated in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [Revision B],** the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the revised ALC guidelines by competent soil scientists following the British Society of Soil Science (BSSS) Professional Competency in Soil Science No.2 - Agricultural Land Classification - England and Wales. A total of 16 soil pits were dug and assessed covering the representative soil types and cross checked with best available data, including descriptions of	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding the key parameters and assumptions that have informed the assessment, particularly where these relate to baseline soil information, the classification and distribution of agricultural land, and the extent to which assumptions will be reviewed in light of the additional survey work. BDC considers that these matters could be addressed through further clarification and refinement of the soil resource survey and associated assessment methodology; however, this was not done prior to the finalisation of the SoCG.	Under Discussion

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		structure for soil associations and soil series. Undertaking further soil pits was constrained by landowner access issues but it is considered the information gathered is sufficient to support the land grade assessments. To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.		
EIA - Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Agriculture and Soils are presented in Section 6.5 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B].** The baseline conditions and receptors presented are considered appropriate. The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. The detailed Soil Resource Plan	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding the characterisation of baseline conditions and receptors across the Order Limits, including the extent and distribution of BMV land and the baseline soil resource information upon which the assessment is based. There is also	Under Discussion

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		will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D].** To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.	uncertainty regarding the scope, density and methodology of the additional soil and ALC surveys and how these will be used to refine the baseline position. BDC considers that these matters could be addressed through further detail on the soil resource survey and associated methodology; however, this was not done prior to the finalisation of the SoCG.	
EIA - Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	The embedded mitigation measures, which is that designed to be an inherent part of the Project for which development consent is sought, for potential Agriculture and Soils effects are set out in Section 6.6 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B].** The embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to state that the implementation of soil mitigation measures will ensure the land can be restored to its previous condition (which would include ALC grade), and	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding the effectiveness and implementation of the embedded mitigation measures, particularly where these are reliant on baseline soil information and the outcomes of further soil and ALC survey work. There is also	Under Discussion

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		as agreed with the landowner, following the completion of the construction phase and any required aftercare period. The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil Resource Plan. Existing ALC maps would be updated to include the new information and provide a full baseline dataset. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of the Outline Soil Resource Plan. To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design.	uncertainty regarding the system that will be used to assess soil health, the details of the soil resource survey, and how reinstatement outcomes will be assessed and demonstrated. BDC considers that these matters could be addressed through further detail within the oSRP and associated documentation; however, this was not done prior to the finalisation of the SoCG.	
3.6.8	Standard mitigation	Standard mitigation measures to reduce potential Agriculture and Soils effects during construction are summarised in Section 6.6 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]** and set out in the **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction.	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		considered appropriate and adequate, in terms of its nature and scale, to address potential Agriculture and Soils effects. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to state that the implementation of soil mitigation measures will ensure the land can be restored to its previous condition (which would include ALC grade), and as agreed with the landowner, following the completion of the construction phase and any required aftercare period. As stated in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]** and **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D],** standard mitigation includes the requirement for a soil survey post-consent / pre-construction in the areas where a detailed ALC survey was not undertaken. These surveys would be undertaken in accordance with the Soil Survey Field Handbook and the revised ALC guidelines, with a survey density of at least one auger bore per hectare (or one per 100 m for linear schemes) where practicable. The soil survey, providing site-specific data, would further inform the final Soil Resource Plan, allowing mitigation measures such as soil handling and storage to be appropriately tailored and effective across all affected areas, even where initial baseline data was limited. To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice**	However, there remains some uncertainty regarding the adequacy and effectiveness of the standard mitigation measures, particularly where these are dependent on the underlying soil resource information and the outcomes of further soil and ALC survey work. There is also uncertainty regarding the details of the soil resource survey, the methodology to be applied, and the system that will be used to assess soil health and the success of soil management and reinstatement measures. BDC considers that these matters could be addressed through further clarification and detail within the oSRP and related documents; however, this was not done prior to the finalisation of the SoCG.	

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		Appendix C - Outline Soil Resource Plan [Revision D] has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.		
3.6.9	Additional mitigation	The consideration of additional mitigation measures for Agriculture and Soils is presented in Section 6.6 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B],** No additional mitigation measures are proposed to minimise effects, other than the measures for handling organic-rich (peaty) soils, which are already set out within the standard mitigation Outline Soil Resource Plan (SRP) as part of **7.2 Outline Code of Construction Practice [Revision G].** The post-consent / pre-construction soil surveys and the final Soil Resource Plan will define a site-specific baseline, including full soil profile data, and establish measurable reinstatement targets. These targets will be used to confirm successful reinstatement in practice, rather than relying solely on returning land to the same ALC class, which may mask sub-grade variations in soil condition. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to state that the implementation of soil mitigation measures will ensure the land can be restored to its previous	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty as to whether the currently proposed mitigation measures will be sufficient to protect soil resources and agricultural land quality across the Order Limits. In particular, there is uncertainty regarding the details of the soil resource survey, the methodology that will be applied, and the system that will be used to assess soil health and demonstrate the success of soil management and reinstatement measures. BDC considers that these matters could be addressed through further clarification and detail within the oSRP and associated documentation; however, this was not done prior to the finalisation of the SoCG.	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		condition (which would include ALC grade), and as agreed with the landowner, following the completion of the construction phase and any required aftercare period. To provide further detail on the scope, density and methodology of the post-consent / pre-construction surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.		
EIA - Assessment Conclusions				
3.6.10	Construction effects	The assessment of effects during construction for Agriculture and Soils is presented in Section 6.7 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B].** The assessment of effects during construction presented is considered appropriate. The construction of temporary haul roads and storage of excavated materials is detailed within **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** with an illustrative detail showing a typical haul road cross section with separated topsoil and subsoil storage included in **2.6.3 Design and Layout Plans - Traffic and Transport [APP-043].**	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding the assessment of construction effects on agricultural land and soils, particularly where this is dependent on baseline soil information, the extent and distribution of BMV land, and the outcomes of further soil and ALC survey	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		Haul roads need to be routed adjacent to the proposed works (e.g. the overhead line and underground cable alignments). The haul roads have been routed, where practicable, to minimise impacts on agricultural land (including known private drainage measures), hedgerows and trees but without significantly increasing the route length (which adds additional stone and therefore vehicle movements) and taking cognisance of the above constraint. Details regarding vegetation clearance requirements for the haul road are in paragraph 4.8.37 to 4.8.41 of **6.4 Environmental Statement Chapter 4 - Project Description [Revision B].** The Applicant continues to engage and discuss site-specific constraints relevant to the detailed design and construction methodology with affected landowners. The post-consent / pre-construction soil surveys and the final Soil Resource Plan will define a site-specific baseline, including full soil profile data, and establish measurable reinstatement targets. These targets will be used to confirm successful reinstatement in practice, rather than relying solely on returning land to the same ALC class, which may mask sub-grade variations in soil condition. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to state that the implementation of soil mitigation measures will ensure the land can be restored to its previous condition (which would include ALC grade), and as agreed with the landowner, following the	work. There is also uncertainty regarding the details of the soil resource survey, the system that will be used to assess soil health, and how the success of soil handling, restoration and reinstatement measures will be evaluated. BDC considers that these matters could be addressed through further clarification and detail within the 08RP and associated documentation; however, this was not done prior to the finalisation of the SoCG. BDC notes that, even if the additional survey work results in refinements to the baseline position, this is unlikely to alter the overall significance of the construction effects given the scale of agricultural land affected. Nevertheless, improved baseline information is necessary to ensure that impacts on BMV land are accurately quantified and that appropriate soil restoration and reinstatement measures can be secured.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		completion of the construction phase and any required aftercare period. To provide further detail on the scope, density and methodology of the post-consent / pre-construction surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.		
3.6.11	Operational (and maintenance) effects	The assessment of effects during operation and maintenance for Agriculture and Soils is presented in Section 6.7 of **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B].** The assessment of effects during operation and maintenance presented is considered appropriate. To provide further detail on the scope, density and methodology of the post-consent / pre-construction surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding the assessment of operational and maintenance effects on agricultural land and soils, particularly in relation to the recovery of soil resources, agricultural productivity and the long-term condition of restored land. There is also uncertainty regarding the details of the soil resource survey, the system that will be used to assess soil health, and how the success of soil reinstatement and restoration	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] has been updated to state that the implementation of soil mitigation measures will ensure the land can be restored to its previous condition (which would include ALC grade), and as agreed with the landowner, following the completion of the construction phase and any required aftercare period.	measures will be monitored and demonstrated over time. BDC considers that these matters could be addressed through further clarification and detail within the oSRP and associated documentation; however, this was not done prior to the finalisation of the SoCG. BDC notes that, whilst the overall significance of operational effects is unlikely to change, improved baseline information and clearer commitments regarding monitoring, restoration and reinstatement would strengthen confidence in the assessment of long-term effects on agricultural land and soils.	
EIA - Cumulative Impact Assessment Conclusions				
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]** and is appropriate for managing construction impacts from the Project on Agriculture and Soil receptors. The scope, density and methodology of any additional surveys will be agreed in consultation with Natural England. The results of these surveys will be used to confirm baseline soil conditions and characteristics, and to inform the detailed design of soil handling, storage, reuse and protection measures within the detailed Soil	BDC welcomes the additions made to the oSRP at Deadline 6 to address the Council's concerns, including the commitment that the ALC maps will be updated based on the additional ALC surveys which will be undertaken post-consent and pre-construction. However, there remains some uncertainty regarding whether the Outline CoCP provides sufficient certainty in relation to the management, protection and restoration of soil resources. In particular, there is uncertainty regarding the details of the soil resource survey, the	Under Discussion

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		Resource Plan. The detailed Soil Resource Plan will be secured by Requirement 4 of the draft DCO, consistent with paragraph 1.1.7 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D].** To provide further detail on the scope, density and methodology of these surveys, section 1.9 of **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** has been updated to provide an outline of survey requirements. As noted above, the full scope would be agreed in consultation with Natural England and would be based on the final design. Existing ALC maps would be updated to include the new information and provide a full baseline dataset.	methodology that will be applied, and the system that will be used to assess soil health and demonstrate the success of soil management and reinstatement measures. BDC considers that these matters could be addressed through further clarification and detail within the oSRP, Outline CoCP and associated documentation; however, this was not done prior to the finalisation of the SoCG.	

3.7 Noise and Vibration

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	Braintree District Council's 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 Noise and Vibration assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 14.2 of **6.14**	BDC noted in their feedback dated 19 December 2025 noted that they agree policy and legislation is relevant and considered within the assessment.	Agreed

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		Environmental Statement Chapter 14 - Noise and Vibration [Revision B], All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA - Approach and Methods				
3.7.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288-APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].**	BDC noted in their feedback dated 19th December 2025 noted that they BDC's position same as 3.5.2.	Agreed
3.7.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through **6.19 Scoping Report [APP-288-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
3.7.5	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 [Revision B].** The key parameters and assumptions presented are considered appropriate. Further details on noise reduction, including parameters and assumptions can be found in	BDC does not agree that the key parameters and assumptions used in the Noise and Vibration assessment represent a robust or reliable worst-case scenario. As evidenced in ES Chapter 14, many of the assumptions that underpin the assessment depend on generic embedded mitigation or assumed Best Practicable Means (BPM), without demonstrating that the predicted reductions	Not Agreed

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		Section 4.12 'Noise and Vibration' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The outline mitigation proposed is based on guidance from BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' and is proportionate for this stage of the assessment. The Applicant disagrees that the construction noise assessment presented in the ES **(6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B])** identifies more than 140 receptors experiencing significant adverse effects. Rather, the assessment identifies receptors where there are *potential* significant adverse effects, *without mitigation.* The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	(typically 5-20 dB) can be achieved in practice across all construction activities and working environments. This is a fundamental concern, particularly as the ES identifies more than 140 receptors experiencing significant adverse effects prior to mitigation during daytime construction works, and multiple receptors during night-time construction. BDC also notes that ES Chapter 14 confirms that the assessment is based on indicative design, with many mitigation decisions deferred to the Main Works Contractor under the future Noise and Vibration Management Plan. This deferral compounds the uncertainty around whether the assumptions can be delivered in practice. Furthermore, the flexible Limits of Deviation introduce the real possibility that construction works may be located closer to sensitive receptors than modelled, potentially increasing noise impacts beyond those assessed. BDC additionally maintains concerns that the ES assumptions around extended working hours, including evenings, nights, weekends and bank holidays, are not supported by clear evidence that adverse impacts can be avoided. As such, it is considered that the ES chapter does not report the potential significant effects outside of normal (BS5228-1) construction hours without mitigation. Key requested information— including receptor-specific BPM proposals, further detail on	

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			construction compound noise controls, and justification of BPM reduction values—remains outstanding. Further discussion was held on 23rd June and an updated SOCG was provided which did not provide sufficient further information to address the Council's concerns. Accordingly, BDC is unable to agree that the key parameters and assumptions presented in ES Chapter 14 are appropriate or sufficiently evidenced at this stage.	
EIA - Baseline Conditions				
3.7.6	Baseline conditions and receptors	The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The baseline conditions and receptors presented are considered appropriate.	BDC noted in their feedback dated 19th December 2025 noted that they agree baseline conditions and receptors are considered appropriate.	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 Noise and Vibration effects, are set out in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B],** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further detailed construction noise and vibration assessment will be undertaken by	Construction BDC does not agree that the measures identified by the Applicant constitute embedded mitigation in the conventional sense. The Council's understanding is that the assessment principally relies upon Best Practicable Means, construction hour restrictions and future contractor-led mitigation to be secured through the NVMP. Whilst reference is made to the NVMP and commitments within the CoCP, BDC considers that these represent measures to be	Not Agreed

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		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 [Revision G],** The detailed assessment will take account of specific works locations within the LoD, specific construction methods and plant, and proposed working times, periods, and duration. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [Revision G].** The assessments, together with mitigation, restrictions, and monitoring and reporting proposals, will be submitted to the local authority as part of the detailed Noise and Vibration Management Plan (NVMP) for approval by the BDC, via Requirement 4 of **3.1 Draft DCO [Revision G]** prior to starting 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 NV05 of **7.2 Code of Construction Practice [Revision GJ),** temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal	developed post-consent rather than embedded mitigation incorporated into the design assessed within the ES. Whilst we do not dispute the need for limits of deviation, we disagree that the proposed extended construction hours would control potential significant effects at all times. As per BDC's comments in "Key parameters and assumptions" above, and other submissions including the Councils Local Impact Report (REP1-148), it has not been demonstrated at this pre-consent stage that the proposed embedded mitigation would prevent significant effects occurring. Operation The Council Agree that during operation no significant effects are anticipated.	

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		restrictions would form part of BPM measures to control noise impacts, as secured by NV01 and NV05 of **7.2 Code of Construction Practice [Revision G].** The are restrictions be agreed with local authority as part of the detailed Noise and Vibration Management Plan (NVMP) for approval by the BDC, via Requirement 4 of **3.1 Draft DCO [Revision G]** prior to starting works together with and mitigation, and monitoring and reporting proposals. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.7.8	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 [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice**	BDC acknowledge that the Applicant has made amendments to the Code of Construction Practice to include stronger commitments for noise mitigation measures to be submitted by the Contractor when the scheme is more fully developed. Notwithstanding the Council's concerns regarding the assessment of the ES at this stage (as above), in principle the Council is satisfied that deferring to the contractor is an acceptable approach now that NV05 in the CoCP has been updated to require LPA approval at deadline 6 [REP6-072].	Agreed

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		[Revision G], The detailed assessment will take account of specific works locations within the LoD, specific construction methods and plant, and proposed working times, periods, and duration. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [Revision G].** The assessment, mitigation measures, restrictions, and monitoring and reporting proposals, will be submitted as part of the detailed Noise and Vibration Management Plan (NVMP) for approval by the BDC, via NV05 of **7.2 Code of Construction Practice [Revision G],** prior to starting 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 NV05 of **7.2 Code of Construction Practice [Revision GJ),** temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [Revision G].** The temporal restrictions mitigation measures , and monitoring and		

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		reporting proposals, will be agreed with local authority as part of the detailed Noise and Vibration Management Plan (NVMP) for approval by the BDC, via Requirement 4 of **3.1 Draft DCO [Revision G]** prior to starting works.		
3.7.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision G].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further detailed construction noise and vibration assessment will be undertaken by the contractor, and the noise and vibration management plan will be updated with site specific mitigation measures, as secured by NV05 of **7.2 Code of Construction Practice [Revision G].** The detailed assessment will take account of specific works locations within the LoD, specific construction methods and plant, and proposed working times, periods, and duration. Best practicable means (BPM) is secured by NV01 of **7.2 Code of Construction Practice [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	BDC's position is the same as that set out under Matter 3.7.8.	Agreed

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		exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [Revision GJ),** temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [Revision G]** and will be agreed with BDC prior to the start of works, along with mitigation, and monitoring and reporting proposals. The assessment, mitigation measures, restrictions, and monitoring and reporting proposals, will be submitted as part of the detailed Noise and Vibration Management Plan (NVMP) for approval by the BDC, via NV05 **of 7.2 Code of Construction Practice [Revision G],** prior to starting works.		
EIA - Assessment Conclusions				
3.7.10	Construction effects	The assessment of effects during construction is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The assessment of effects during construction presented is considered appropriate. Although working periods outside of the 'daytime' periods identified in BS 5228-	BDC does not agree with the Applicant's conclusion that significant adverse construction noise and vibration effects are unlikely to occur. As set out in the Local Impact Report (REP1-148), BDC considers that the working hours proposed—07:00-19:00 Monday to Friday and 07:00-17:00 on Saturdays, Sundays, Bank Holidays and Public Holidays, plus up to an	Not Agreed

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		1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Part 1: Noise, as detailed in Section 4 of **6.14 Environmental Statement Chapter 14: Noise and Vibration [Revision B]** are more sensitive to noise the 'daytime' period (hence their lower threshold for potential significant effects), works during these periods would not directly lead to a significant adverse effect. Consideration of the sensitivity of the working period would be required as part of the application of Best Practicable Means (BPM) as per commitment NV01 within the **7.2 Outline Code of Construction Practice [Revision G].** The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday - Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [Revision B],** The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [Revision G],** The construction works are largely linear and would not occur along the entire length of the	additional hour either side for start-up and close-down—are excessive and offer insufficient respite for Noise Sensitive Receptors (NSRs). Requirement 7 of the draft DCO, when combined with Requirement 7(5) start-up/close-down provisions and Requirement 7(4) allowances for activities outside core hours, creates a 16 hour daily operational envelope with no enforceable upper noise limit during those periods. This substantially increases the likelihood of material adverse effects on residential amenity, health and wellbeing. BDC remains concerned that weekend and Bank Holiday construction—even if not continuous—has not been robustly assessed in terms of community impact and may understate the true significance of effects. BDC also notes that ES Chapter 14 identifies large numbers of receptors experiencing significant effects prior to mitigation, and that the conclusion of "no significant residual effects" relies heavily on assumed BPM reductions and unspecified contractor-stage measures, without secured, receptor-specific mitigation. The ES acknowledges that assessments are indicative and that mitigation is to be developed later, further undermining confidence in the conclusion. Despite a further meeting with the Applicant, no further technical information has been provided quantifying the likely construction noise impacts	

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		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 construction working hours set out in **3.1 Draft Development Consent Order [Revision G]** define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the	during weekends, Bank Holidays or other sensitive periods in the absence of mitigation. It is incumbent upon the Applicant to demonstrate what the potential significant effects are and how these effects will be minimised / mitigated where possible. Accordingly, BDC cannot agree that the ES demonstrates that construction noise and vibration impacts will be not significant, and this matter remains under discussion.	

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		controls set out in the **7.2 Outline Code of Construction Practice [Revision G].** The inclusion of Sundays and Bank Holidays within the defined core working hours provides 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 and avoiding a prolonged overall construction period, which would itself result in longer term exposure to construction impacts. A blanket prohibition on Sundays/bank holidays would materially harm the deliverability of this Critical National Priority (CNP) project The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project. **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [Revision G],** significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft**		

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		Development Consent Order [Revision G] within the final Code of Construction Practice. All assessments, proposed mitigation measures, temporal restrictions, and monitoring and reporting proposals will be submitted for approval by BDC in the Noise and Vibration Management Plan (NVMP) secured by Requirement 4 of **3.1 Draft Development Consent Order [Revision G]** prior to the start of works. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.7.11	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 [Revision B],** The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant agrees to continue engaging with BDC regarding operational noise, including review of detailed operational noise assessments and finalised mitigation proposals where appropriate. Commitment GG13 of **7.2 Outline Code of Construction Practice [Revision G]** states that the 'triple araucaria' conductor (or alternative technology that performs to the same or better standard on standard lattice	BDC agrees that significant operational noise and vibration effects are not anticipated. The Council welcomes the Applicant's commitment to continued engagement regarding detailed operational noise assessments and mitigation proposals as the design develops.	Agreed

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		pylon) will be used. This is a low noise conductor and is the basis for operational noise from overhead lines being scoped out of the ES. Despite this, additional information is proposed in **6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [Revision B].** Operational noise levels will be below the LOAEL even directly underneath the line, and during worst-case wet conditions, with noise levels being significantly lower during dry conditions. As the LOAEL is not exceeded even directly underneath the overhead line, this outcome is not dependant on the specific location of the overhead line with the LoD.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** and is appropriate for managing construction impacts from the Project. Commitments NV01, NV03 NV04, and NV05 specifically outline the framework for the control of construction noise and vibration. These require detailed assessments to be undertaken by the Main Works Contractor(s) detailing the specific mitigation measures, temporal restrictions, and monitoring and reporting requirements. These will be	BDC acknowledge that the Applicant has made amendments to the Code of Construction Practice to include stronger commitments for noise mitigation measures to be submitted by the Contractor when the scheme is more fully developed. Notwithstanding the Council's wider concerns regarding the conclusions of the ES noise assessment (as above), in principle the Council is satisfied that deferring to the contactor is an acceptable approach now that NV05 in the	Agreed

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		submitted to BDC for approval as part of the detailed Noise and Vibration Management Plan (NVMP) secured via NV05 **of 7.2 Code of Construction Practice [Revision G]** prior to the start of works. In addition, for some activities, Section 61's may be proposed through consolation with BDC. Through this framework, BDC will have oversight of the works.	CoCP has been updated to require LPA approval at deadline 6 [REP6-072]	
Other matters as required				
3.7.13	NSR off Old Mill Lane	The assessment of weekend construction works within **6.14 Chapter 14 - Noise and Vibration [Revision B]** includes two key assumptions which means this interpretation is not applicable in practice. **1. Mitigation is assumed for weekend works** Weekend and bank holiday periods are more sensitive than weekdays, reflected in the lower threshold of 55 dB $L_{Aeq,T}$ (compared to 65 dB for weekdays). The weekday assessment assumes no mitigation as a worst-case to identify 'hot-spots' where mitigation is required to avoid significant adverse effects. Applying this assumption to weekends would overstate impacts. Instead, the weekend assessment assumes a reasonable 10 dB attenuation from mitigation, meaning the same 'hot-spot' locations	BDC maintains the position that the Environmental Statement has not robustly demonstrated that significant adverse construction noise effects would be avoided at the NSR off Old Mill Lane (Threadkells) or at similar rural receptors. In particular, the Council remains of the view that the ES assessment relies on assumptions regarding mitigation and Best Practicable Means that have not been fully evidenced at Examination stage, and therefore does not provide a sufficiently robust worst-case assessment of potential impacts [See "[A]" below for more information] However, following amendments secured during the Examination, including the requirement for a contractor-prepared Noise and Vibration Management Plan (NVMP) to be submitted to and approved by the local planning authority under commitment NV05 of the CoCP, BDC is satisfied that an appropriate mechanism is now	Agreed

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		identified for weekdays without mitigation are the same as those for weekends with indicative mitigation (because the difference between the thresholds is also 10 dB). **2. Temporal restrictions are applied** Where thresholds could still be exceeded with mitigation, temporal restrictions are considered as part of Best Practicable Means (BPM). This ensures that significant adverse effects do not occur during weekend periods. Implementing mitigation would ensure that significant adverse effects would not occur in this situation, or others like it, as follows: • The Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within **7.2 Outline Code of Construction Practice [Revision G].** • Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application - **(7.2 Outline Code of Construction Practice Appendix F -**	in place to assess, manage and control construction noise effects at this location prior to works commencing. Accordingly, whilst the Council's concerns regarding the robustness of the ES assessment remain as a matter of principle, BDC accepts that the updated control framework provides sufficient certainty that any significant adverse effects at this receptor can be appropriately managed through the requirement discharge process. On that basis, this matter is considered agreed. [A] As set out in BDC's Relevant Representations, LIR and subsequent deadline submissions, the ES identifies this property as experiencing a Medium magnitude construction noise impact prior to mitigation, with predicted levels for pylon construction of 60-66 dB LAeq,T at approximately 140 m from proposed Pylon TB78. Under BS 5228 Category A weekend thresholds (55 dB), this could amount to a Large magnitude effect (i.e., > +5 dB above the threshold) during weekend periods. The same concern applies to other isolated rural receptors located in close proximity to proposed pylon locations. BDC is not satisfied with the Applicant's explanation that weekend assessments assume an automatic 10 dB attenuation to offset the lower threshold for significance. This assumption is unsupported, unsecured, and optimistic, representing neither a guaranteed nor	

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		Outline Noise and Vibration Management Plan [Revision D]). • Should the resultant construction noise levels exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), with the inclusion of all practicable mitigation measures, temporal restrictions would be required to either: - Avoid works during that period at that location, or - If works during this period cannot be avoided, limit the duration of the works such that the effect is not significant. Such situations may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the contractor and the local authority. Commitments NV01, NV03 NV04, and NV05 specifically outline the framework for the control of construction noise and vibration. These require detailed assessments to be undertaken by the Main Works Contractor(s) detailing the specific mitigation measures, temporal restrictions, and monitoring and reporting requirements. These will be submitted to BDC for approval as part of the detailed Noise and Vibration Management Plan (NVMP) secured via NV05 of **7.2 Code**	evidenced reduction. As noted in the LIR, the ES relies heavily on theoretical BPM, rather than committed or receptor-specific measures, and does not demonstrate that such reductions can realistically be delivered across the range of construction activities. Similarly, BDC remains concerned that reliance on temporal restrictions to avoid significant weekend effects is not secured in the DCO or Outline CoCP. Temporal restrictions are presented as a discretionary BPM tool, rather than a fixed or enforceable mitigation commitment. As a result, the ES conclusion that weekend impacts will not be significant is not robust.	

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		of Construction Practice [Revision G] prior to the start of works. In addition, for some activities, Section 61's may be proposed through consolation with BDC. Through this framework, BDC will have oversight of the works.		
3.7.14	LOD requirements	The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on Figure 4.1: Proposed Project Design of the ES **(6.4.F1 Environmental Statement (ES) Figure 4.1: Proposed Project Design [APP-133]).** However, the Limit of Deviation (LoD) for overhead lines (and associated pylons) is considered in Section 9 of **6.14 Environmental Statement Chapter 14: Noise and Vibration [Revision B]. It** is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy Statement for England, the NPPF and Planning Practice Guidance for Noise).	BDC does not agree that the Environmental Statement has robustly assessed the worst-case construction noise and vibration impacts arising from the full extent of the Limits of Deviation (LoD). As highlighted in the LIR and subsequent deadline submissions, the ES construction noise assessment appears to be based on indicative pylon locations shown on the Works Plans, rather than the maximum permissible envelope within which pylons may be constructed under Article 5 of the draft DCO. This approach fails to test scenarios where pylons or construction compounds could be located considerably closer to Noise Sensitive Receptors (NSRs) — in some cases by up to 50 metres or more — should the LoD be exercised. Such proximity changes could materially increase noise levels, particularly during pylon foundation works, haul road construction, or heavy plant operation. BDC therefore considers that the ES does not present a credible worst-case assessment, and that construction noise effects at NSRs (including Threadkells on Old Mill Lane) may be significantly understated.	Not Agreed

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		It should also be considered that the LoD includes the conductors and the associated conducted swing, as shown in **2.6.2 Design and Layout Plans - Overhead Lines [APP-042],** As such, in practice, pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at 'bends' in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD. The LoD was reviewed through the EIA process when producing the ES and there are no locations where movement towards the edge of the LoD, and towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures. Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [Revision G]** for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation	As a result, it has not been demonstrated at this stage that LoD-enabled movement "would not lead to significant adverse effects", nor can it accept that worst-case construction noise impacts have been assessed adequately.	

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		measures would be identified and implemented for each pylon such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application - **(7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision]**) and agreed with BDC prior to the start of works. Commitments NV01, NV03 NV04, and NV05 specifically outline the framework for the control of construction noise and vibration. These require detailed assessments to be undertaken by the Main Works Contractor(s) detailing the specific mitigation measures, temporal restrictions, and monitoring and reporting requirements. These will be submitted to BDC for approval as part of the detailed Noise and Vibration Management Plan (NVMP) secured via Requirement 4 of **3.1 Draft DCO [Revision G]** prior to the start of works. In addition, for some activities, Section 61's may be proposed through consolation with BDC. Through this framework, BDC will have oversight of the works. 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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3.7.15	Noise limits	There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the ABC method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Part 1: Noise, and as detailed in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of **7.2 Code of Construction Practice [Revision G]),** temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [Revision G]** The assessments, mitigation proposals, temporal restrictions, and monitoring and reporting proposals will be	BDC acknowledges that there are no statutory construction noise limits, but does not agree that reliance solely on BS 5228 'ABC' threshold assessments and discretionary BPM is sufficient to protect Noise Sensitive Receptors (NSRs) during periods outside core working hours. As set out in the LIR and subsequent deadline submissions, BDC remains particularly concerned that the draft DCO permits start-up and close-down activities up to one hour either side of core hours, with no enforceable noise limit during these periods. In rural areas with low background noise levels, even preparatory or plant-movement activities can result in noticeable and adverse disturbance. The ES does not provide a robust assessment of the likely noise levels associated with these activities, nor does it secure mitigation to ensure that impacts will fall below the Lowest Observed Adverse Effect Level (LOAEL). BDC therefore maintains that a specific, enforceable noise limit should apply to start-up and close-down periods at the nearest NSRs. Consistent with established precedent in the Bramford to Twinstead DCO (Requirement 7(4)), BDC considers that a limit of 50 dB LAeq,T during these peripheral working periods is both reasonable and necessary to safeguard residential amenity. This is particularly important given the scale of works, the extensive working-hour envelope, and the absence of guaranteed BPM reductions.	Not Agreed

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		submitted to BDC as part of the detailed NVMP secured by NV05 **of 7.2 Code of Construction Practice [Revision G].** Through this framework, significant adverse effects will be avoided. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Without such a limit being secured in the DCO, BDC cannot agree that noise effects associated with early and late working have been adequately mitigated or assessed. This matter therefore remains under discussion, pending Applicant confirmation of a secured noise limit approach.	
3.7.16	Piling operations	Such a restriction should be borne out of assessment outcomes, to avoid significant adverse effects rather than blanket restrictions which in some cases may be unnecessary. The assessment of construction noise and vibration detailed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision G]** indicates that there are no likely significant adverse effects from any construction activity, including piling, with the implementation of best practicable means (BPM) to reduce effects. Any restrictions, where deemed appropriate, will be borne from assessment outcomes secured via commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** and mitigation measures will be considered as appropriate to avoid significant adverse effects and reduce adverse effects. Such mitigation measures may include temporal restrictions as part of best practicable means secured via commitments NV01, NV02 and	BDC does not agree that Requirement 7(2) should restrict only percussive piling. As set out in the Council's Relevant Representations, LIR, and subsequent deadline submissions, all piling operations have the potential to generate material noise and vibration impacts, particularly at sensitive rural receptors located close to proposed pylon foundations. The ES (Chapter 14) identifies piling as one of the construction activities with potential to generate significant levels of vibration and high noise outputs, depending on ground conditions and technique. Although the Applicant assumes BPM will prevent significant effects, the ES provides no secured, receptor-specific evidence that BPM would reliably reduce impacts across all piling types, durations, and locations. BDC therefore considers it essential that all forms of piling are subject to the same working-hour controls as percussive piling, consistent with established precedent in the Bramford to Twinstead DCO, where Requirement 7(4)	Not Agreed

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		NV03 of **7.2 Outline Code of Construction Practice [Revision GJ.** Update May 2026 At Deadline 4, Commitment NV23 of **7.2 Outline Code of Construction Practice [Revision G]** was 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."* The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	applied uniformly to all piling methods. This is necessary to ensure clarity, enforceability, and adequate protection for Noise Sensitive Receptors (NSRs), especially in rural areas with low ambient sound levels. BDC also notes the ES relies on future contractor-stage assessments (NV05) and BPM assumptions rather than securing firm mitigation now. Until the Applicant demonstrates, through detailed and secured commitments, that non-percussive piling poses no risk of significant adverse noise or vibration effects, BDC cannot accept a narrower restriction. Accordingly, BDC maintains that Requirement 7(2) must apply to all piling operations, not solely percussive piling.	
3.7.17	Noise Screening	This comment relates to the inclusion of screening in some plant items in Appendix 14.1: Construction Noise and Vibration Data of the ES **(6.14.A1 Environmental Statement Appendix 14.1 - Construction Noise and Vibration Data [Revision B]).** It is correct that a 10 dB reduction was applied to some fixed plant items, such as generators. However, the inclusion of this screening mitigation does not affect the overall activity	BDC does not agree that the treatment of screening within the ES is sufficiently clear or robust As set out in the Council's Relevant Representations and LIR, there is a direct inconsistency between: • Appendix 14.1, which applies a 10 dB screening reduction to certain fixed plant items, and	Not Agreed

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		noise level. This is because noise from items such as generators, even in an unmitigated scenario, is substantially lower than that from other plant associated with the same activities, and therefore does not materially increase the combined noise level. Additionally, the worst-case activity for each construction phase is considered in the assessment. The outcome is therefore the same irrespective of the inclusion of this screening. However, such items would be expected to be screened, but the outcome of the assessment is not dependent on that being the case. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	• ES Chapter 14, paragraph 14.7.6, which states: *"for the purposes of this assessment, no specific mitigation (such as screening) is included."* This contradiction creates uncertainty about whether screening has been assumed in the construction noise predictions, and, if so, whether the ES is relying on mitigation that is neither committed nor secured. BDC also notes that the ES provides no detail on: • how screening would be designed, • where it would be deployed, • how a 10 dB reduction would be reliably achieved in practice, or • how screens would be maintained throughout the construction programme. Given that ES conclusions for many receptors depend on assumed BPM reductions, BDC considers it essential that all screening assumptions used in the noise modelling are explicitly stated, justified, and secured. Without this clarity, BDC cannot confirm that the ES represents a robust worst-case assessment. BDC notes that, if screening is not relied upon in the assessment, the ES should make this expressly clear and apply a consistent methodology throughout.	

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3.8 Health and Wellbeing

Braintree District Council defer comments regarding Health and Wellbeing to Essex County Council. Please find details of this in **5.9.3 Essex County Council Statement of Common Ground [Revision F].**

3.9 Historic Environment

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation (Built Heritage)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 11.2 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. All non-designated heritage assets were assessed to determine their value in accordance with Scoping Report [APP-288-APP-296], Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings	[Place Services Built Heritage on behalf of Braintree District Council] Based on a further review of the identification and assessment of the value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209] we are able to agree this matter.	Agreed

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		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 states at paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES and in several places refers to detail being proportionate to the importance/significance of the heritage asset'. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.		
3.9.2	Policy and legislation (Archaeology)	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 11.2 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].**	Place Services (Archaeology) on behalf of Braintree District Council is currently reviewing the relevant documentation. The ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA - Approach and Methods				
3.9.3	Study area	The study area was agreed through 6.19 **Scoping Report [APP-288-APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. 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
3.9.4	Data sources (Built heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of 6.11 **Environmental Statement Chapter 11- Historic Environment [Revision D].** Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The Historic Environment Baseline Report **(6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C])** 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	This matter is agreed,	Agreed

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		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.		
3.9.5	Data sources (archaeology) - Desktop	Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].**	Braintree District Council has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026.)	Agreed
3.9.6	Data sources (archaeology) - survey data	Sufficient survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the **Supplementary Environmental Information [AS-068 to AS-083],** This represents a combined total of 74% of the overall geophysical survey, area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of **Supplementary Environmental Information**	There has been sufficient desktop data collected, however, the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. BDC (Archaeology) advised that this matter can be considered agreed during a call held on 22 June 2026.	Agreed

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		[AS-068 to AS-083], The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.		
3.9.7	Assessment methodology (Built heritage)	**6.20 Scoping Opinion [APP-297]** stated: "77?e *Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities."* The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of 'high value' could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. The Applicant will consider this during the update of the Baseline Report for DCO submission. It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed	The assessment methodology has been discussed at a number of Historic Environment Thematic Group Meetings held between July 2022 and October 2024. BDC stated at statutory consultation that all listed buildings should be considered, at a minimum, of high value/ sensitivity as their designation indicates they are of national significance. A scale within this category of 'high value' could be agreed to differentiate between Grade I, Grade II*, and Grade II buildings, for example. National Grid will consider this during the update of the Baseline Report for DCO submission. 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. Historic Environment Viewpoints feedback received on 4th March 2025 from Essex Place Services (EPS).	Agreed

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		buildings, where the method is still under discussion. Historic Environment Viewpoints feedback will be taken into account for the assessment. The Applicant position regarding non-designated heritage assets is as outlined in section 3.7.1 (Policy and Legislation) above.	As agreed in the meeting in January 2026, this matter is agreed.	
3.9.8	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through **6.19 Scoping Report [APP-288-APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	BDC is in agreement with this matter,	Agreed
3.9.9	Key parameters and assumptions (Built heritage)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11-Historic Environment [Revision D].** The key parameters and assumptions presented are considered appropriate. In March 2025, The Applicant issued an updated version of the Historic Environment (HE) Viewpoints information.	BDC is currently reviewing the ES Chapter, Unti | the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains." As agreed in the meeting in January 2026, this matter is agreed.	Agreed
3.9.10	Key parameters and assumptions (Archaeology)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11-Historic Environment [Revision D].** The key parameters and assumptions presented are considered appropriate.	BDC (Archaeology) is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "*The information obtained to date provides sufficient detail to*	Agreed

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		Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the **Supplementary Environmental Information [AS-068 to AS-083].** This represents a combined total of 74% of the overall geophysical survey, area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of **Supplementary Environmental Information [AS-068 to AS-083].** The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.	*characterise the likely nature and extent of any currently unrecorded remains."* BDC (Archaeology) advised that this matter can be considered agreed during a call held on 22 June 2026.	
EIA - Baseline Conditions				
3.9.11	Baseline conditions and receptors (Built heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D .** The baseline conditions and receptors presented are considered appropriate. Further detail relevant to this section are outlined in section 3.6.4 (Data Sources).	This matter is agreed.	Agreed

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3.9.12	Baseline conditions and receptors (Archaeology)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** The baseline conditions and receptors presented are considered appropriate February 2025, the Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.	ECC agreed this matter during call in January 2026.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.9.13	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **5.15 Design Development Report [APP-122]** provides an explanation of 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	BDC agrees that through sensitive routing impacts on known/identified heritage assets can be reduced however the impact on unknown archaeological remains can only be better understood through further intrusive archaeological evaluation. This is most relevant in areas of underground cable where there will be an impact on archaeological remains. Further time is needed to review 5.15 Design Development Report [APP-122] but we note this refers only to changes requested to the route alignment which were made before the final ES. BDC advised that this matter can be considered agreed during a call held on 22 June 2026.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		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.		
3.9.14	Standard mitigation (Built heritage) - H06	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]** and set out in **7.2 Outline Code of Construction Practice [Revision G],** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G].** Specifically, this means:	H06 - Standard Mitigation (Reinstatement of Historic Landscape Features) BDC agrees that the principles in H06 are appropriate, and welcomes the commitment to reinstate hedgerows, boundaries, walls and other historic landscape features in a manner sensitive to local character. However, BDC emphasises that implementation must be fully secured and enforceable through the final CoCP and associated detailed documents to ensure reinstatement reflects historic form, materials and landscape character, as required by the LIR.	Agreed

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		Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature. Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists. Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible. If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.		
3.9.14a	Standard mitigation (Built heritage) - H07	Regarding H07 **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision D]** did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach	BDC acknowledge the additions made by the Applicant and consider this matter is now agreed.	Agreed

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		in H07 and the associated NV04 is considered to be appropriate. Commitments NV01, NV02, NC03, NV04, NV05, and NV20 in **7.2 Outline Code of Construction Practice [Revision G]** all address points regarding vibration. Specifically, NV05 requires that the Main Works Contractor(s) undertake a detailed construction vibration assessment based on their specific methodologies and works locations. Following this assessment, they will determine the specific mitigation measures required to avoid significant adverse effects, and minimise adverse effects, as per commitment NV01. The assessments, mitigation, monitoring, and reporting proposals will be submitted to the relevant local planning authority as part of the Noise and Vibration Management Plan (NVMP) via commitment NV05 and Requirement 4 of **3.1 Draft DCO [Revision G].** Should a risk of damage due to vibration be identified, this would constitute a potential significant adverse effect, and the works would be subject to a Section 61 agreement through consultation with the relevant local planning authority. The Section 61 agreements, together with NVMP via commitment NV05 and Requirement 4 of **3.1 Draft DCO [Revision G],** would secure the mitigation, monitoring, and reporting proposals through agreement with the relevant local planning authority.		

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		7.2 Outline Code of Construction Practice [Revision G], commitment GG30 includes: "A *contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken".*		
3.9.15	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11-Historic Environment [Revision D]** and set out in **7.2 Outline Code of Construction Practice [Revision G],** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	BDC agreed this matter during call held January 2026.	Agreed
3.9.16	Additional mitigation	The consideration of additional mitigation measures is presented in Section 11.6 of **6.11 Environmental Statement Chapter 11-Historic Environment [Revision D].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. An updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** was submitted at Deadline 5. The update and scope of the document will be	The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation. BDC noted during call in January 2026 that this matter is not relevant for Built Heritage. Outline AMS-WSI approved on 14th July therefore this matter can be considered agreed.	Agreed

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		informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.		
EIA - Assessment Conclusions				
3.9.17	Construction effects (Built heritage)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** The assessment of effects during construction presented is considered appropriate.	This matter is agreed.	Agreed
3.9.18	Construction effects (archaeology)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** The assessment of effects during construction presented is considered appropriate.	This section is currently under review (BDC Archaeology) Email 4th Nov 2024 - Archaeology - consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. Email 6th Nov 2024 - further discussion required regarding vibration assessments.	Agreed

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			Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	
3.9.19	Operational (and maintenance) effects (Built heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D],** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	Agreed
3.9.20	Operational (and maintenance) effects (archaeology)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D],** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Following review of the ES, BDC confirmed agreement on this matter during call in January 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.21	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]** and is appropriate for managing construction impacts from the Project. Noting BDC's comments on H07 above, the Applicant proposes the oCoCP in relation to archaeology is agreed.	BDC confirms that the Outline Code of Construction Practice (CoCP) contains the necessary standard mitigation measures for archaeology, as set out in ES Chapter 11. The Council is satisfied that archaeological matters are now agreed, subject to detailed implementation through the final Written Scheme of Investigation and contractor-stage plans.	Agreed

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			For built heritage, agreement to this is subject to improving measure HO7 as per the “standard mitigation” section above.	
Other matters as required				
3.9.22	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	The Applicant shared overarching WSIs in March - June 2024 and December 2024. The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.9.23	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. There are still addenda to site specific WSIs forthcoming that have yet to be issued.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.9.24	Outline Archaeological Mitigation Strategy and Outline WSI.	The contents of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required. The Applicant issued the Outline AMS-OWSI for the post-consent stage of the project in April 2025.	BDC considers the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMSEWSI) to be broadly appropriate in structure and consistent with established NSIP practice. The Council recognises that the staged approach to archaeological evaluation and mitigation presented in the ES is proportionate and aligns with national guidance. However, the AMSIzlWSI remains under review, and BDC is	Agreed

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		An updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** was submitted at Deadline 5.	not yet able to confirm agreement pending further detailed examination of the April 2025 iteration, including the scope of evaluation, methodology, and interfaces with the detailed post-consent WSL As identified in the LIR, BDC expects continued engagement with the Applicant to ensure that site-specific archaeological requirements—particularly in areas of elevated archaeological potential—are fully secured through the final WSL Accordingly, this matter remains under discussion at this stage. Outline AMS-WSI confirmed agreed 14th July 2026.	
3.9.25	Programme for completion of archaeological fieldwork	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025. A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.		

3.10 Landscape and Visual

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that the correct guidance has been used and that this matter is agreed.	Agreed
EIA - Approach and Methods				
3.10.2	Study area	The study area for assessing Landscape and Visual was agreed through **6.19 Scoping Report [APP-288-APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic workshops.	The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.	Agreed

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3.10.3	Datasources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].**	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed.	Agreed
3.10.4	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].** The outline methodology for assessing Landscape and Visual was agreed through **6.19 Scoping Report [APP-288-APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic workshops A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on 28 November 2024 to follow up any additional changes to the assessment. The Applicant issued an update on LVIA Viewpoints and Methodology in March 2025. Matters relating to residential visual amenity are considered under ID 3.9.14.	The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops. E-mail from BDC dated 8th October 2024 - stated some areas that are agreed, e.g. study area and general categories for visual susceptibility, methodology for ZTV mapping and viewpoint photography and photomontage creation. However, this e-mail also stated some areas of concern in relation to viewpoints and visual value. BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed subject to matters surrounding residential assessment where further discussion is required.	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The key parameters and assumptions presented are considered appropriate.	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed	Agreed
EIA - Baseline Conditions				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B],** The baseline conditions and receptors presented are considered appropriate.	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** and also Paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects as far as possible.	BDC does not agree that the embedded mitigation presented in ES Chapter 13 is adequate, or that it is capable of preventing extensive, long-term, and in some cases severe landscape and visual harm across Braintree District. As set out in the Local Impact Report (REP1-148) and subsequent deadline submissions, the proposed embedded measures, principally routeing choices, pylon design selection and limited micrositing flexibility, do not materially reduce the scale or significance of the impacts identified in the ES.	Not Agreed

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		Embedded mitigation includes the mitigation proposed in the Environmental Area around Fairstead CSE compounds and also the 3:1 tree replacement where this occurs within the Order Limits. It is not possible for embedded mitigation measures to remove the significant residual effects of a project of this nature. 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 Applicant considers that embedded mitigation is robust, proportionate and appropriately integrated into the Project design, in line with national policy (including EN-5). Alternative options, including undergrounding, have been carefully assessed through the iterative optioneering process, demonstrating a balanced and evidence-based approach to design and mitigation. The Applicant recognises that a mutually agreed position has not been reached, and	BDC notes that the ES identifies widespread significant adverse effects on multiple Landscape Character Areas (LCAs), Visual Receptor Areas (VRAs), Public Rights of Way, rural settlements and highly valued countryside. These significant effects persist even after embedded mitigation has been applied, demonstrating that embedded measures are insufficient to address the magnitude of harm arising from the proposed overhead line. As such, BDC maintains that the embedded mitigation falls short of what is required to protect valued local landscapes, long-distance recreational routes and rural amenity sites.	

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		therefore the matter is recorded as Not Agreed.		
3.9.8	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G]** The Applicant considers these measures to be appropriate, proportionate and consistent with the mitigation hierarchy to address potential effects. It is not considered reasonable or possible for standard mitigation measures to wholly mitigate significant temporary impacts of 400 kV infrastructure during construction. As set out in section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** 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	BDC does not agree that the standard or additional mitigation measures set out in ES Chapter 13 and the Outline CoCP are adequate to address the extent and severity of the predicted landscape and visual effects. As stated in BDC's position on embedded mitigation, the Project would give rise to widespread and long-term significant adverse effects across multiple Landscape Character Areas, valued countryside, long-distance recreational routes and Visual Receptor Areas within Braintree District. The standard mitigation measures, primarily construction-stage good practice, vegetation management, temporary screening and reinstatement, do not materially reduce or offset these impacts. Likewise, the ES identifies no meaningful additional mitigation, and instead relies on the embedded design alone, despite the persistence of extensive significant effects. BDC therefore considers the mitigation hierarchy to have been inadequately applied, with only minimal measures brought forward despite the scale of residual harm. Accordingly, BDC maintains that both the standard and additional mitigation measures are not sufficient, and that greater use of alternative design approaches (including undergrounding) is required if significant landscape and visual harm	Not Agreed

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		of NPS EN-1 and established landscape assessment practice. The Applicant does not agree that the mitigation hierarchy has been inadequately applied or that the presence of residual significant effects demonstrates that the mitigation is insufficient. For a project of this scale and nature, it is neither reasonable nor practicable to fully mitigate all temporary construction effects or all operational landscape and visual effects. The relevant policy test is not the elimination of all adverse effects, but whether likely significant effects have been appropriately assessed, avoided or reduced where reasonably practicable, and weighed in the planning balance. The Applicant also does not agree that additional undergrounding is required. Alternative design approaches, including undergrounding in sensitive locations, have been considered throughout the route selection and design development process. The current design represents a balanced outcome having regard to environmental, engineering, technical, economic and deliverability considerations. Accordingly, the Applicant considers that the Project complies with the requirements of NPS EN-1, that the mitigation hierarchy has been appropriately applied, and that the landscape and visual mitigation package is proportionate to the effects identified.	is to be reduced. For these reasons, the matter remains Not Agreed.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.10.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B],** The Applicant's position on landscape mitigation is set out in Section 3.10 **of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Not agreed- see above,	Not Agreed
EIA - Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B],** The Environmental Statement is based on an assumed worse case tree and hedgerow removal, as detailed within **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** together with potential tree and hedgerow loss as	E-mail received on 4th Nov 2024 suggested that concerns had been raised by a number of stakeholders (inc. BDC) regarding the lack of assessment for tree and hedgerow loss along the route. BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed upon receipt of the list of significant effects.	Agreed

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		illustrated in the Arboriculture Impacts Plan (Figure A13.6.1) in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [Revision B].** The assessment of effects during construction presented is considered appropriate. 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, as set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B].** This has also been captured within the Arboricultural Impact Assessment and Ecology Biodiversity Net Gain assessment. The Landscape and Visual Impact Assessment (LVIA) set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] and appendices [APP-228 to APP-232]** identifies significant adverse residual effects on landscape and visual receptors during construction. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following Visual Receptor Areas (VRA) are predicted to experience significant effects up	This can now be agreed.	

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		to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham. Whilst during the iterative design process the Project has sought to minimise vegetation removal as far as practicable and to retain existing trees and woodlands wherever possible in accordance with paragraph 5.11.27 of NPS EN-1 (2024), vegetation loss will however result. **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]** identifies all trees and hedgerows which have the potential to be affected (this includes the assessment categories Removed, Affected Managed and Potentially Affected) by the Project; assesses the preliminary impact of the Project; and recommends protection measures as necessary.		
3.10.11	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 [Revision** |. The assessment of effects during operation (and maintenance) presented is considered appropriate. The LVIA set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and **appendices [APP-**	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is agreed upon receipt of the list of significant effects. This can now be agreed.	Agreed

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		228 to APP-232] identifies significant adverse residual effects on landscape and visual receptors during operation. The following landscape receptors are predicted to experience significant effects up to a distance of approximately 1.5 km: Blackwater and Brain Valley LCA; Gosfield Wooded Farmland LCA; and Central Essex Farmlands LCA. The following VRAs are predicted to experience significant effects up to a distance of approximately 1.5 km: VRA E1 Coggeshall; VRA E2 Feering and Rivenhall; VRA E3 Kelvedon; VRA E4 Silver End; VRA E5 Black Notley and White Notley; and VRA E6 Terling and Witham.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate for managing construction impacts from the Project.	BDC noted in the meeting to discuss the Statement of Common Ground on 2nd February 2026 and through comments provided on 19th December 2025 that this matter is still under discussion pending further review of the Outline CoCP. Following review this is now agreed for landscape matters.	Agreed
3.10.13	Outline LEMP	The Applicant considers that **7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual**	BDC welcomes the additional detail provided within Revision F of the Outline Landscape and Ecological Management Plan [REP5-158] regarding the maintenance, monitoring and management of reinstated planting and landscape mitigation measures.	Agreed

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		[Revision B] and is robust, proportionate and appropriate for the delivery, establishment, management and monitoring of landscape mitigation associated with the Project. The Applicant does not agree that **7.4 Outline Landscape and Ecological Management Plan [Revision G]** lacks sufficient detail to provide confidence in the delivery of mitigation. As is typical for an outline document submitted at the DCO stage, **7.4 Outline Landscape and Ecological Management Plan [Revision G]** establishes the objectives, principles, responsibilities and management requirements that will be secured through the DCO and subsequently developed into detailed management plans. The level of detail provided is proportionate to the current stage of design and consistent with standard NSIP practice. Responses to matters raised in BDC's LIR can be found in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** Responsibility for implementation, monitoring and maintenance will be secured through the DCO and associated certified documents, ensuring that mitigation measures are delivered and maintained in accordance with **7.4 Outline Landscape and Ecological Management Plan [Revision G].**	BDC notes that Section 10 now provides further clarity on aftercare arrangements, including the responsibilities of National Grid and its Main Works Contractor(s) during the five-year aftercare period, the role of the Landscape Clerk of Works (LCoW), and the commitment to longer-term maintenance and monitoring of mitigation measures within Environmental Areas. Whilst BDC notes that the long-term success of landscape reinstatement will ultimately depend upon effective implementation and maintenance, the Council is satisfied that sufficient information has now been provided to explain how the proposed landscape measures would be managed and monitored. BDC therefore considers this matter resolved.	

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		The Applicant maintains its position on the sufficiency of the five-year aftercare period but has updated Section 10 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which relates to aftercare, to include some additional detail on how reinstated planting will be maintained, noting that this reflects established practice and provides sufficient opportunity to ensure successful establishment of mitigation planting.		
Other matters as required				
3.10.14	Residential Visual Amenity Assessment	**6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** was prepared in line with the Landscape Institute's 'Technical Guidance Note 2/19 Residential Visual Amenity Assessment'. Worst-case scenarios, where a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which is predominantly, but not always, the closest point to the property) have been considered in the RVAA. With regards to property E7 - West Ford Farm Cottage, the worst-case scenario would be the movement of pylon TB93 (currently proposed along the 'centreline of work' approximately 152 m from the property's garden and 157 m from its dwelling) to the	BDC has reviewed the Applicant's updated RVAA visualisations for receptors E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm) and welcomes the inclusion of the lateral Limits of Deviation (LoD) within those visualisations. However, the Council remains concerned that the visualisations do not assess the full extent of the authorised flexibility, including the potential for pylons to move longitudinally within the Order Limits. The exercise of the full LoD could result in pylons being positioned closer to these properties than currently illustrated. BDC considers that the updated visualisations reinforce, rather than diminish, the Council's concerns regarding residential visual amenity impacts at receptors E7 and E8. In the Council's view, the proposed pylons would appear both "unpleasantly encroaching" and "inescapably dominant" when viewed from these properties,	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		closest point of the LoD from the dwelling (as shown on the Works Plans **(2.3 Works Plans - Section E [Revision B])).** This would make the pylon, instead, approximately 65 m from the property's garden and 60 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in BDC's Relevant Representation). In this worst-case scenario the Project would be appear closer (therefore larger) in the views experienced from the property, and the pylon would still be located within the field to the property's immediate north, but there would not be any additional impacts. Additionally, the property's northern boundary hedge and trees would still filter some views from the dwelling's ground floor windows and the garden's main patio area to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on West Ford Farm Cottage that would give rise to the 'residential visual amenity threshold' being breached.	which are indicators identified within the Applicant's own RVAA methodology as being capable of giving rise to unacceptable effects on residential visual amenity. The Council remains concerned that the exercise of the authorised LoD could further exacerbate those effects. To provide certainty and avoid the potential for visual impacts to worsen through later design development, BDC considers that commitment GG34 of the CoCP should be amended to fix the alignment in the vicinity of these receptors. This would require towers TB93 and TB94 to be fixed in relation to receptor E7, and towers TB97 and TB98 to be fixed in relation to receptor E8. BDC therefore remains of the view that the Applicant has not demonstrated that unacceptable residential visual amenity impacts would be avoided at receptors E7 and E8, and consequently this matter remains unresolved.	

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		With regards to property E8 - Whiteheads Farm, the worst-case scenario would be the movement of pylon TB98 (currently proposed along the 'centreline of work' approximately 126 m from the property's garden and 158 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on the Works Plans **(2.3 Works Plans - Section E [Revision B])).** This would make the pylon, instead, approximately 75 m from the property's garden and 100 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in Braintree District Council's Relevant Representation). In this worst-case scenario the Project would be appear closer (so larger) in the views experienced from the property, but there would not be any additional impacts. Additionally, the evergreen hedgerows along the property's north-east facing boundary would still filter some views from the dwelling's ground floor windows and the garden to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project		

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		would not have such an overbearing and dominant impact on Whiteheads Farm that would give rise to the 'residential visual amenity threshold' being breached. The Applicant considers that the Residential Visual Amenity Assessment is robust and has been prepared in accordance with recognised guidance, including the use of realistic worst-case scenarios within the Limits of Deviation. Detailed testing for properties such as West Ford Farm Cottage and Whiteheads Farm demonstrates that, even under these conservative assumptions, the Project would not result in overbearing, dominant or unacceptable effects on living conditions, nor would it breach the relevant residential visual amenity thresholds. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

3.11 Socio-economics, Recreation and Tourism

Braintree District Council defer comments regarding Socio-economics, Recreation and Tourism to Essex County Council. Please find details of this in **5.9.3 Essex County Council Statement of Common Ground [Revision F].** The only comment Braintree District Council wish to make is that they share ECC's view that a skills and tourism package is required to mitigate the impacts of the development Something that would sit wholly within the remit of the planning application and not within community benefits. In response, the Applicant is producing an Employment and Skills Plan which will be submitted at Deadline 5. The Applicant will engage with the relevant local authorities on its scope to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record.

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3.12 Cumulative Effects

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.12.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	BDC noted in their feedback dated 19th December 2025 noted that as far as they can see, all relevant legislation and guidance has been complied with.	Agreed
EIA - Approach and Methods				
3.12.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides	BDC notes that the Applicant has updated the cumulative developments schedule and welcomes the inclusion of developments previously identified by the Council. The Council acknowledges that the cumulative assessment has been undertaken using a methodology based on committed developments and, on that basis, is satisfied	Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate). Since 1 April 2025 up to and including 31 January 2026 was presented in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Revision A) [REP4-163]** which provided a mid-examination update at Deadline 4. A further update which captures an updated long list and short list of other developments from 1 February 2026 up to and including 8 May 2026 is presented in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Revision B),** provided at Deadline 7..	that the principal cumulative developments within the District have now been identified. BDC notes, however, that the proposed route interacts with the emerging Kings Dene strategic allocation at Feering. Whilst the Council accepts that the allocation is not currently a committed development for the purposes of the cumulative effects assessment, it considers it important that, as proposals for Kings Dene progress through the planning process, the Applicant engages with the site promoters and local planning authority to ensure that any potential interfaces between the projects are appropriately coordinated. Accordingly, BDC considers this matter resolved.	
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288-APP-296]** and **6.20**	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping	Agreed

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		Scoping Opinion [APP-297] received from the Planning Inspectorate. The intra-project cumulative effects assessment has considered the combined effects on receptors arising from landscape, visual, noise and recreational impacts (including PRoW, traffic and amenity) impacts. The assessment has concluded that there is potential for significant cumulative effects at various locations along the route of the Norwich to Tilbury Project to affected receptors including pedestrians, cyclists and horse riders. Both the intra-project and inter-project cumulative effects assessment consider the Limits of Deviation of the Norwich to Tilbury Project. The inter-project cumulative effects considers a precautionary but reasonable 'worst-case' approach where limited information is available for other developments, in accordance with Planning Inspectorate guidance 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'. The Applicant considers that the inter-project and intra-project cumulative effects assessment complies with the requirements of NPS EN-1, NPS EN-5 and the EIA Regulations and provides the Examining Authority with a sufficient and robust evidence base upon which to reach an informed decision.	Report and Scoping Opinion received from the Planning Inspectorate.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** The Applicant considers parameters and assumptions outlined in paragraphs 17.5.23 - 28 are appropriate, proportionate and consistent with relevant guidance and assessment practice. The Applicant notes BDC's concern that certain assumptions may influence the assessment conclusions. However, the Applicant has not been provided with any specific evidence demonstrating that the assumptions are inappropriate, nor that any alternative assumptions would materially alter the conclusions of the cumulative effects assessment. The methodology has been applied consistently, and significant cumulative effects have been concluded where supported by the evidence. Accordingly, the Applicant considers that there is no substantive disagreement regarding the key parameters and assumptions underpinning the cumulative effects assessment and therefore believe this matter should be recorded as Agreed.	BDC acknowledges the additional cumulative effects information submitted during Examination. However, the Council remains concerned that certain assumptions underpinning the cumulative effects assessment may influence the conclusions reached regarding the extent and significance of cumulative effects. Accordingly, this matter remains under discussion.	Under Discussion

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
EIA - Baseline Conditions				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B],** The baseline conditions and receptors presented are considered appropriate.	BDC acknowledges the baseline conditions and receptors identified for the cumulative effects assessment and does not raise any substantive concerns regarding their identification. The Council's concerns relate primarily to the assumptions, assessment approach and conclusions drawn from the cumulative effects assessment rather than the baseline itself. Accordingly, BDC considers this matter agreed.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.12.7	Embedded mitigation	The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280].** Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]..** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The residential amenity effects identified do not breach the thresholds set out in In terms of cumulative construction noise effects, **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** does not identify any significant noise	BDC acknowledges the embedded mitigation measures incorporated into the Project design and assessment. However, the Council remains concerned that the embedded mitigation relied upon within the cumulative effects assessment does not fully address all potentially significant cumulative effects identified by BDC. In particular, the Council's concerns relate to cumulative landscape and visual effects, residential amenity impacts arising from the interaction of construction noise and extended working hours across multiple major projects, and the potential for the exercise of the Limits of Deviation to result in greater cumulative effects than those assessed. Accordingly, whilst BDC recognises that embedded mitigation will reduce some cumulative effects, the adequacy of that	Not agreed

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		effects, and the measures set out in **7.2 Outline Code of Construction Practice [Revision G]** will reduce effects, individually and for cumulative effects. Appropriate mitigation is secured through **7.2 Outline Code of Construction Practice [Revision G], 7.3 Outline Construction Traffic Management Plan [Revision E]** and other topic-specific management plans (such as noise), which provide mechanisms for controlling construction activities, managing traffic movements, minimising disturbance and coordinating works. Although significant cumulative landscape and visual effects have been identified, not all identified effects require mitigation. It is not practicable to mitigate these through landscape mitigation measures, predominantly due to the scale of the works and the height of the pylons. The Limits of Deviation are assessed in **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]** and are not assessed again in the cumulative effects assessment. Accordingly, the Applicant considers that this matter has been appropriately assessed and addressed through secured mitigation and ongoing coordination measures. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.	mitigation in addressing all cumulative impacts is not currently agreed	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.12.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280].** Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in **Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]** and set out in **7.2 Outline Code of Construction Practice [Revision G]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Please see matter 3.10.7 above for the Applicant's further response. Accordingly, the Applicant considers that this matter has been appropriately assessed and addressed through secured mitigation and ongoing coordination measures. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.	BDC acknowledges the standard mitigation measures proposed through the Outline Code of Construction Practice and other management plans. However, the Council's concerns remain that, as with the embedded mitigation measures, the standard mitigation relied upon within the cumulative effects assessment may not address the full extent of potential cumulative effects. In particular, BDC remains concerned regarding cumulative landscape and visual effects, residential amenity impacts arising from the interaction of construction noise and extended working hours across multiple major projects, and the potential for the exercise of the Limits of Deviation to give rise to greater cumulative effects than those assessed. Accordingly, whilst BDC recognises that the proposed measures will reduce cumulative effects, the adequacy of the standard mitigation package is not currently agreed.	Not agreed
3.12.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B],** Additional mitigation is considered appropriate and	BDC acknowledges the additional mitigation measures identified by the Applicant within the cumulative effects assessment. However, the Council is not currently persuaded that the proposed mitigation fully addresses all potential cumulative effects identified during Examination.	Not agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		adequate, in terms of its nature and scale, to address potential effects. Please see matter 3.10.7 above for the Applicants further response. Accordingly, the Applicant considers that this matter has been appropriately assessed and addressed through secured mitigation and ongoing coordination measures. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.	In particular, BDC remains concerned regarding cumulative landscape and visual effects, residential amenity impacts arising from the interaction of construction noise and extended working hours across multiple major projects, and the potential for the exercise of the Limits of Deviation to give rise to greater cumulative effects than those assessed. Whilst additional mitigation has been proposed, BDC is not satisfied that it is sufficient to address all reasonably foreseeable cumulative impacts and therefore cannot agree that no further mitigation is required.	
EIA - Assessment Conclusions				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B].** The assessment of effects during construction presented is considered appropriate. An inter-project cumulative effects assessment has been undertaken for the Project and is presented in **6.17 Environmental Statement Chapter 17 — Cumulative Effects [Revision B]** which includes disturbance to residents and demands on labour force, landscape and visual effects, public health, pedestrians,	BDC acknowledges the additional cumulative construction assessment work undertaken during Examination. However, the Council remains concerned that the assessment may not fully reflect the cumulative impacts experienced by communities where the Project overlaps geographically and temporally with other major infrastructure and development proposals. In particular, BDC remains concerned regarding cumulative landscape and visual effects during the construction period, residential amenity impacts arising from the interaction of construction noise and extended working hours across multiple projects, disruption to agricultural land and the potential for local communities to experience prolonged periods of	Not agreed

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		cyclists and horse riders). Further detail of each development noted by Braintree is provided in the bullet points that follow: • Bramford to Twinstead is considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** • The Pelham to Rayleigh 400 kV development is not considered in the cumulative assessment as it comprises refurbishment works (i.e. replacement of existing components) undertaken by permitted development, would involve minimal construction works • Rivenhall Incinerator is considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** • The draft allocation for 5,000 new homes to the north of Kelvedon has not been considered, as a decision to promote to site by Braintree Council was made in September 2025 - post submission of the DCO application. The Project used a cut-off date of 1 April 2025 to confirm the long list of developments considered within the cumulative assessment. However, since the 1 April the Applicant has been undertaking a monthly review of planning registers to check whether there are any new relevant developments. Where this review identifies the potential for new or	disturbance where major projects are constructed concurrently. BDC further remains concerned that the exercise of the Limits of Deviation could give rise to greater cumulative construction effects than those assessed within the Environmental Statement. Accordingly, BDC does not currently agree that all reasonably foreseeable cumulative construction effects have been fully assessed or adequately mitigated.	

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		different significant effects or changes to the conclusions presented in the ES then these would be published into the Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate) • The approved solar farm at Land East of Littlebury Coggeshall Road Feering is considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** • A proposed up-to 600 dwelling parker land development at Land South West of Coggeshall Road Kelvedon is considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** • There are multiple applications at Bradwell Quarry, two of which are currently live. 24/00390/ECC is considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and ESS/28/25/BTE would be considered as per the draft allocation for 5,00 new homes as above • An approved solar development at Land West of Park Road Rivenhall, Cressing Farm equestrian facilities, and the recently consented solar farm at Land South West of Cressing Temple Witham Road Cressing is considered within **6.17**		

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		Environmental Statement Chapter 17 - Cumulative Effects [Revision B], An intra-project cumulative effects assessment has been undertaken for the Project and is also presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B],** The Applicant acknowledges BDC's concerns regarding cumulative effects, particularly where multiple infrastructure projects may overlap and noting the potential for local communities to experience disturbance. It is noted that the infrastructure projects identified will be subject to different construction programmes, and that individual projects will likely incorporate appropriate mitigation (for example in relation to construction good practice) to manage effects on communities. These matters have been assessed within the Environmental Statement, including the interaction of effects across relevant environmental topics and the identification of significant cumulative effects where appropriate. Please see matter 3.10.7 above for the Applicant's further response. In relation to the cumulative effects on agricultural land, the Applicant considers that this matter has been appropriately considered. It was determined that the cumulative effects on agriculture and soils receptors within the areas surrounding the Project would be significant, both during		

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		construction and operation (and maintenance). Accordingly, the Applicant considers that this matter has been appropriately assessed and addressed through secured mitigation and ongoing coordination measures. The Applicant recognises that a mutually agreed position has not been reached and therefore this matter is recorded as Not Agreed.		
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision 3]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update ([Revision B],** The assessment of effects during operation (and maintenance) presented is considered appropriate.	BDC acknowledges the Applicant's assessment of cumulative operational and maintenance effects and does not raise any substantive concerns regarding the methodology or conclusions reached in relation to these effects. The Council's principal cumulative effects concerns relate to the construction phase of the Project rather than its operation or maintenance. Accordingly, BDC considers this matter agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.12.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B],** and provides an appropriate and robust	BDC acknowledges that the Outline Code of Construction Practice has been updated during Examination to reflect comments made by the Council and other local authorities, and recognises its important role in managing construction-related effects. Whilst the Council continues to maintain some outstanding concerns regarding specific 0C0CP provisions, as set out elsewhere within this SoCG and in previous Examination	Under Discussion

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		framework for managing construction effects arising from the Project. The Applicant notes BDC's concern that elements of the mitigation framework rely upon post-consent surveys, assessments and management plans. However, this is a standard and appropriate approach for a project of this scale and nature, allowing detailed mitigation to be refined once detailed design and construction methodologies are finalised. Importantly, these measures are secured through the draft DCO and certified documents, providing a clear and enforceable mechanism for implementation. The Applicant does not agree that this approach reduces certainty regarding the effectiveness of mitigation or undermines the cumulative effects assessment. Whilst the Applicant acknowledges that BDC continues to raise concerns regarding the assessment assumptions and the effectiveness of mitigation, the Applicant considers that **7.2 Outline Code of Construction Practice [Revision G]** provides a robust mechanism for managing construction-related cumulative effects and that no substantive evidence has been presented to demonstrate that the assessment conclusions are unsound. The Applicant recognises that a mutually agreed position has not been reached and	submissions, BDC's principal cumulative effects concerns relate to the assessment of likely cumulative impacts rather than the overall structure of the 0C0CP itself. The Council remains concerned that key elements of mitigation are dependent upon post-consent surveys, assessments and management plans, reducing certainty as to the effectiveness of cumulative mitigation and the extent of cumulative effects which may ultimately arise. The Council therefore considers that the effectiveness of the 0C0CP in managing cumulative effects is dependent upon the adequacy of the cumulative effects assessment and the assumptions upon which that assessment is based. Accordingly, whilst BDC acknowledges the improvements made to the 0C0CP, this matter remains under discussion.	

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		therefore this matter is recorded as Not Agreed.		

3.13 Development Consent Order

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

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

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

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

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
3.13.1	DCO Requirements - Management plans	The **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision G]** and the **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]** are provided as appendices of the **7.2 Outline Code of Construction Practice [Revision G],** The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be	On the basis of further review, BDC's technical specialists in Air Quality, Geology and Hydrogeology, and Noise and Vibration are satisfied that the 0C0CP adequately addresses the necessary construction-phase controls within their respective disciplines. While some concerns remain in relation to other matters, including working hours, the Council is satisfied in principle that the 0C0CP can operate as an appropriate substitute for a standalone CEMP.	Agreed

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		required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO [REP5-060].** The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.		
3.13.2	DCO Requirements - Construction hours	The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and further explained why reduced working hours would not be sufficient to deliver this Project by the end of 2030 to DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211].** The proposed core working hours allow for efficient delivery while maintaining safeguards to manage noise and other impacts. 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	BDC objects to the construction hours proposed in Requirement 7 of the draft DCO. The Council considers the proposed hours, including working on Saturday afternoon, Sundays and Public Holidays, plus start-up and close-down activities up to one hour either side of the core working hours, to be excessive and to provide insufficient respite for Noise Sensitive Receptors (NSRs). BDC's Relevant Representation highlights that extended hours risk significant noise impacts and may understate the significance of effect at NSRs. The Council therefore seeks amendments to Requirement 7 to: reduce weekend and public holiday working; limit start-up/close-down activities; require approval from the relevant planning authority for any working outside of the agreed core hours; more closely align the drafting with the more restrictive and recently examined Bramford-Twinstead Order. The Council maintains that, without these changes, the environmental and amenity effects	Not Agreed

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		week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend. The assessment presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** is based on a set of parameters that include the core working hours for the construction phase of the Project. It assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start up and close down activities taking place up to one hour either side of the core hours, and activities which can take place outside of the core working hours. The assessment concluded that with the embedded mitigation and controls set out in the **7.2 Outline Code of Construction Practice [Revision G],** significant effects during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of the **3.1 Draft DCO [REP5-060]** within the final Code of Construction Practice. The Applicant does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours.	arising from construction noise cannot be effectively controlled. The working hours proposed by the Applicant are not agreed.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.13.3	DCO Requirements - Construction management plans	The **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner and is controlled by Requirement 4 of Schedule 3 to the **3.1 Draft DCO [REP5-060].** The definition of Code of Construction Practice in Article 2 includes its appendices. The Applicant is committed to continue discussions with BDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BDC accepts the use of an Outline Soil Resource Plan as the mechanism for securing soil management but remains concerned that the version currently submitted does not yet provide sufficient certainty regarding survey methodology, soil health assessment, mitigation, restoration and monitoring arrangements. Accordingly, whilst progress has been made, this matter remains under discussion.	Under Discussion
3.13.4	DCO Requirements - Applications made under requirements	The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead	BDC welcomes the Applicant's amendment to increase the determination period for applications made under Requirements from 28 calendar days to 25 business days. Whilst this represents a positive amendment, BDC remains concerned that the proposed timescale may not be sufficient given the scale and complexity of the Project and the likely volume and technical	Not Agreed

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
		allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft DCO**	nature of applications. The Council therefore continues to seek a longer determination period. As set out in the Council's ExQ1 response (DCO 1.A2), atypical submission requires: • 1-3 working days for validation, logging and circulation internally; • 21 days for technical consultation with internal and external specialists; • additional time to resolve deficiencies in submitted material, request revisions, and re-consult where necessary; and • at least one week for internal reporting, checking and sign-off. The Council's experience on Bramford to Twinstead demonstrates that even a 35 day period, supported by a Planning Performance Agreement, has proven highly challenging and has placed repeated pressure on both parties. Accordingly, BDC's position, as stated in its Local Impact Report and confirmed in its ExQ1 response, is that a minimum of 56 days (or 40 working days) is required for the lawful, robust and efficient discharge of Requirements. This period properly reflects the technical complexity, volume of information, and need for meaningful consultation. The Council therefore requests that Schedule 4 be amended to: • set a default determination period of 56 days (or 40 working days);	

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		[REP5-060] to extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	• include flexibility for extensions where necessitated by the complexity of submissions. Until these amendments are made, the matter remains Not Agreed.	
3.13.5	DCO Requirements - Further information	Given the Project's status as a project of critical national importance, the Applicant considers five business days for the relevant discharging authority to request additional information to be proportionate and appropriate. Paragraph 1(4) of Schedule 4 to **3.1 Draft DCO [REP5-060]** allows the relevant authority to seek the Applicant's consent to request further information after the five business day period if necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	BDC does not agree that the five-day period proposed in Schedule 4 for requesting further information is sufficient or realistic. In its ExQ1 response (DCO 1.A2), the Council explained that NSIP submissions frequently contain highly technical material requiring circulation to multiple internal and external specialists. Identifying where further information is needed cannot reliably be achieved within five days — particularly where: • the submission spans several environmental disciplines; • consultees need time to identify omissions or technical gaps; • preliminary review is delayed by officer workload, leave, or specialist availability; and • issues only become clear once consultees begin detailed assessment.	Not Agreed

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			BDC therefore requests that the period for seeking further information be increased to a minimum of seven business days, which is consistent with the Council's internal processes and reflects the complexity of typical Requirement submissions. The Council also requests that the Applicant serve all relevant Requirement documents on statutory consultees at the same time as the relevant planning authority to avoid unnecessary loss of time during validation and distribution. These changes are necessary to reduce the risk of deemed consent being triggered simply because the authority was not given adequate time to identify missing or inadequate information. Accordingly, this matter is Not Agreed pending amendment of the draft DCO to incorporate at least a seven-business-day period and simultaneous service of documents on all consultees.	
3.13.6	DCO Requirements - Fees	The Applicant has updated this figure in **3.1 Draft DCO [REP5-060]** to align with the current national guidance. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	BDC confirms that the amendments made to Schedule 4 appropriately reflect the current fee regulations and considers this matter resolved.	Agreed
3.13.7	DCO Requirements - Construction management plans	**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision D]** and **7.2**	BDC previously raised concerns regarding the absence of a standalone Construction Environmental Management Plan (CEMP),	Agreed

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		Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D] are provided as appendices of **7.2 Outline Code of Construction Practice [Revision G].** **7.2 Outline Code of Construction Practice [Revision G]** includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to **3.1 Draft DCO [REP5-060].** The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	noting that the Bramford to Twinstead DCO included both a CEMP and a Materials and Waste Management Plan as defined control documents. Following the Applicant's response to ExQ DCO 1.G3 and subsequent review of the Outline Code of Construction Practice (0C0CP) and supporting appendices, the Council has reconsidered its position. BDC accepts that the 0C0CP incorporates the environmental management measures and construction-phase controls that would ordinarily be expected within a standalone CEMP. The Council has sought and received clarification on a number of technical matters within the 0C0CP to satisfy itself that the document adequately secures the mitigation measures and controls necessary to manage construction-phase environmental effects. BDC's technical specialists in Air Quality, Geology and Hydrogeology, and Noise and Vibration are satisfied that the 0C0CP provides an appropriate framework for controlling construction-phase impacts within their respective disciplines. Whilst the Council continues to have concerns regarding certain other matters, including construction working hours, compliance, complaints management and aspects of the discharge and approval process, BDC is now satisfied in principle that the 0C0CP can appropriately fulfil the role of a Construction	

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			Environmental Management Plan and therefore no longer objects to the absence of a separate standalone CEMP.	
3.13.8	DCO Requirements - Stages of the authorised development	The Applicant has updated the notice period in **3.1 Draft DCO [REP5-060]** to five business days and considers that this proposed notice period is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) within that period. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	BDC welcomes the Applicant's proposed amendment to increase the notification period prior to the commencement and completion of a stage. However, the Council notes an apparent inconsistency between the draft DCO and the Schedule of Changes, with the latter indicating a notification period of 25 business days whilst the draft DCO continues to refer to 5 business days. Subject to this inconsistency being corrected and the draft DCO being amended to secure a 25 business day notification period, BDC would consider this matter resolved. Until such time, the Council is unable to agree the current drafting.	Not Agreed
3.13.9	DCO Requirements - Design and layout plans	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the **3.1 Draft DCO [REP5-060].** As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the	BDC does not agree that the current drafting of Requirement 6 provides sufficient control over the design and layout of the authorised development. The phrase 'general accordance with' affords the undertaker a high degree of flexibility and does not give the Council or affected communities confidence that amendments to works plans or design details will remain within the environmentally assessed parameters. For a scheme of this scale, BDC considers that the wording should be strengthened to require the	Not Agreed

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		extent to which any effects are acceptable within the terms of the draft DCO. Therefore, the Applicant considers that no amendment to **3.1 Draft DCO [REP5-060]** is necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	authorised development to be carried out in substantial accordance with the relevant plans. In addition, the judgement as to whether any design changes would give rise to materially new or materially different environmental effects should not rest solely with the undertaker. Consistent with the approach advocated in the Council's LIR and ExQ1 submissions, BDC considers that the relevant planning authority must be the decision-maker on whether any proposed variation remains within the assessed environmental envelope. Until Requirement 6 is amended to secure these safeguards, this matter remains Not Agreed.	
3.13.10	DCO Requirements - Design of permanent buildings	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in the **3.1 Draft DCO [REP5-060].** As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of **3.1 Draft DCO [REPS-060].** Therefore, the Applicant considers that	BDC does not agree that the current drafting provides sufficient control over the design of permanent buildings. The use of the term 'general accordance with' affords too much flexibility to the undertaker and creates a risk that buildings may diverge materially from the parameters assessed in the Environmental Statement. For a scheme of this scale, where the substations and associated structures have the potential for significant landscape, heritage and visual effects, stronger wording is required. BDC therefore requests that the drafting be amended so that the design of permanent buildings must be in substantial accordance with the relevant design and layout plans.	Not Agreed

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		no amendment to **3.1 Draft DCO [REP5-060]** is necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Furthermore, the Council considers that the decision on whether any variation would give rise to materially new or materially different environmental effects should not rest solely with the undertaker. Consistent with the Council's LIR and ExQ1 submissions, this judgement should fall to the relevant planning authority, ensuring independent oversight and preventing unassessed changes from progressing. Until Requirement 12 is amended to secure these safeguards, the matter remains Not Agreed.	
3.13.11	DCO Requirements - Decommissioning	The Applicant acknowledges the concerns raised regarding the retention of infrastructure that is no longer required for operational purposes. As the licensed electricity transmission owner, the Applicant has statutory duties to develop, maintain and operate an efficient, coordinated and economical transmission system. Decisions regarding the continued retention, replacement or removal of assets are therefore subject to ongoing technical, operational and regulatory review throughout the life of the network. Where infrastructure is formally decommissioned and its removal is considered appropriate, Requirement 13 (decommissioning) will be engaged and decommissioning activities would need to be undertaken in accordance with the relevant statutory, regulatory and environmental	The Council has reviewed Requirement 13 (Decommissioning) and maintains its position, as previously set out in its submissions, that the current drafting does not provide sufficient certainty that obsolete infrastructure will be removed in a timely or consistent manner. The Council therefore considers that an additional or revised requirement should be included within the DCO to secure the following: • A mandatory obligation on the undertaker to identify and remove any pre-existing equipment within the Order Limits • which is not required to enable, facilitate or support the authorised development, or any other ongoing operational use by the undertaker; • A requirement for such equipment to be removed within a defined period (for example, within 12 months of completion of	Not Agreed

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		requirements applicable at the time. However, it is not necessary, nor appropriate for the DCO to extend control over the lifecycle management of operational transmission assets, which is governed through a separate, well-established statutory and regulatory framework. Therefore, the Applicant does not consider that additional controls within **3.1 Draft DCO [REP5-060]** are either necessary or appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	the relevant part of the authorised development), in accordance with an approved land restoration scheme; • A mandatory obligation on the undertaker to notify the relevant planning authority as and when any part of the authorised development or associated infrastructure becomes obsolete; and • A requirement for decommissioning and restoration of such obsolete infrastructure to be carried out in accordance with Requirement 13 (or equivalent), following approval of a written scheme.	
Other matters as required				
3.13.12	Validation checklist	The Applicant agrees that a validation checklist (or similar) could be helpful to improve the quality and consistency of submissions and assist in the efficient determination of applications to discharge Requirements. The Applicant notes that a draft validation checklist has been prepared collaboratively by the host authorities and welcomes the opportunity to consider this as part of the ongoing discussions with the host authorities, including BDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	BDC welcomes ongoing discussions regarding the introduction of a validation checklist for applications to discharge Requirements. The Council considers that a validation checklist would improve the quality and consistency of submissions, assist in ensuring that applications are capable of efficient determination, and provide applicants and local authorities with greater certainty regarding information requirements. The Council notes that a draft checklist has been prepared collaboratively between local authorities and the matters proposed for inclusion include application descriptions, approved document references, audit trails, pre-	Under discussion

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			submission engagement and associated licences and permits. Whilst discussions remain ongoing regarding the final content and operation of the checklist, BDC supports the principle of a validation checklist and considers that it would represent good practice for the discharge of Requirements process.	
3.13.13	Compliance monitoring and enforcement	The Applicant considers that **7.2 Outline Code of Construction Practice [Revision G],** secured by Requirement 4 of **3.1 Draft DCO [REP5-060],** together with the suite of management plans, monitoring and reporting mechanisms secured through the DCO Requirements, provides a robust framework for construction management, compliance monitoring and record keeping. The Applicant notes that the Planning Act 2008 clearly establishes the respective roles of the undertaker and local planning authorities. The Applicant is responsible for day-to-day compliance, including monitoring, audit trails and record keeping, whilst Local Planning Authorities retain their statutory powers as enforcing authorities to investigate potential breaches and take enforcement action where necessary. The Applicant considers that these arrangements provide appropriate clarity regarding the relationship between the	BDC considers that effective compliance monitoring, reporting and enforcement arrangements are an important component of the Project's environmental management framework. The Council welcomes the compliance processes set out within the Outline Code of Construction Practice but considers that greater clarity would be beneficial regarding the relationship between the Applicant's internal compliance procedures and the role of local planning authorities as enforcing authorities under the Planning Act 2008. In particular, BDC supports the establishment of clear arrangements relating to compliance reporting, investigation of non-compliance, maintenance of audit trails, record keeping, communication protocols and ongoing liaison between the Applicant and relevant enforcing authorities. The Council considers that such arrangements would promote transparency, improve public	Under discussion

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		Applicant's compliance procedures and the role of Local Planning Authorities. Section 7.2 of the Outline Code of Construction Practice requires monitoring data to be recorded and retained by the Applicant and its contractors as part of the Project's environmental management system. Where relevant, this information is to be made available to the relevant local planning authority on request, rather than through routine reporting. Where routine reporting is required, this is secured through Table 6.1 of the Outline Code of Construction Practice. Notwithstanding the above, the Applicant is committed to maintaining a transparent and collaborative relationship with host authorities, including BDC, throughout the construction period. Regular project governance meetings and subject-specific engagement forums provide ongoing opportunities to discuss compliance matters, emerging issues and lessons learned.	confidence and assist in the timely resolution of issues during construction.	

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Appendix A Draft DCO wording

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

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

Table A.1 Braintree District Council - Comments on the draft DCO

ID	Matter	National Grid's Position	Braintree District Council's Position	Status
1	DCO Wording - Notification Process	The Applicant agrees that it is important to agree the notification process and will engage with the Councils on this point post-consent.	BDC previously sought clarification regarding the notification procedures referenced within the Outline Code of Construction Practice, including circumstances where the relevant planning authority would be notified of unexpected contamination or other geology and hydrogeology matters. Following amendments made to commitment GH08 within the revised Outline Code of Construction Practice, the Council is satisfied that appropriate notification, approval and escalation procedures have been incorporated. On this basis, BDC considers that sufficient mechanisms now exist to ensure the relevant planning authority is notified where necessary and that this matter is resolved.	Agreed
2	DCO Wording - Geology and Hydrogeology	The Applicant notes the Council's position and considers that the controls proposed in the application documents will achieve this.	BDC has reviewed the amendments made to the geology, hydrogeology and contaminated land controls within the Outline Code of	Agreed

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			Construction Practice, including the revised wording of commitment GH08. The Council is satisfied that appropriate procedures are now secured in relation to approvals, notifications, investigation, remediation and escalation processes where contamination or other ground conditions are encountered. Subject to implementation of the controls secured through the DCO and associated management plans, BDC considers that the geology and hydrogeology effects of the proposed development are capable of being appropriately managed. Accordingly, BDC considers this matter resolved.	
3	DCO Wording - Air Quality and Emissions	The Applicant notes the Council's position and considers that the controls proposed in the application documents will achieve this.	BDC has reviewed the air quality and emissions controls secured through the draft DCO, Outline Code of Construction Practice and associated management plans. The Council is satisfied that appropriate measures are secured in relation to the control of dust, emissions and construction-phase air quality effects, together with the mechanisms necessary for implementation, monitoring and enforcement. Subject to implementation of the approved mitigation measures and controls secured through the DCO, BDC considers that the air quality and emissions effects of the proposed	Agreed

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			development are capable of being appropriately managed. Accordingly, BDC considers this matter resolved.	
4	DCO Wording - Pre-commencement operations	The Applicant has carefully considered the definition of 'pre-commencement operations' to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project and has provided justification for its inclusion as drafted in the 3.2 Explanatory Memorandum (Revision C). The additional items contained in the definition of 'pre-commencement operations' beyond those consented in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are: • Listed building surveys - these have been included at the request of Essex County Council in paragraph 5.2.8 of its Local Impact Report [REP1-161]; • Protection works comprising utilities protection works or fencing and protection slabs - these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire	BDC does not agree that the current definition of 'pre-commencement operations' within the draft DCO provides sufficient clarity or environmental control. As set out in the Council's Local Impact Report and ExQ1 responses (including DCO 1.S5 and DCO 1.A2), a broad and unqualified definition risks allowing works to proceed before key environmental protections have been approved under Requirement 4. This is inconsistent with the scale and sensitivity of the NSIP, where early works may still have material environmental effects. BDC considers that the wording should be amended so that only genuinely low-impact, non-invasive activities may be undertaken prior to discharge of Requirements, and that any activities capable of causing environmental effects must not be included within 'pre-commencement operations'. In addition, the definition should incorporate a control mechanism to ensure the undertaker cannot self-certify whether a proposed pre-commencement activity does or does not give rise to materially new or different environmental effects. BDC therefore supports the addition of wording to the effect that	Not Agreed

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		Green Energy Enablement Project) Development Consent Order 2024. • Set up works associated with the establishment of temporary laydown areas - this simply extends the ability to carry out set up works to temporary laydown areas in addition to construction compounds. National Grid does not consider its inclusion to be materially beyond the scope already set out. • Receipt and erection of construction plant and equipment - this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put National Grid in a favourable position to deliver the Project by the target date. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Whilst noting the Planning Inspectorate's comments in Advice Note 15 regarding the use of the term "commence" within draft Orders, the ability to undertake these "pre-commencement operations" ahead of main construction is of	pre-commencement operations must exclude any activity which, in the opinion of the relevant planning authority, could give rise to materially new or different environmental effects from those assessed in the ES. This approach is consistent with the concerns raised in the LIR regarding early-stage works, the need for enforceable terminology, and the risk that uncontrolled pre-commencement activities could undermine environmental safeguards. Accordingly, BDC requests that Article 2 be amended to narrow and clarify the definition of 'pre-commencement operations' and to align it with the principle that no works capable of giving rise to materially new or materially different environmental effects from those assessed in the Environmental Statement occur before the relevant Requirements have been discharged. This matter remains Not Agreed until appropriate amendments are made.	

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		great importance in the context of the anticipated construction programme for this Critical National Priority project which is geared towards achieving energisation by 2030 to facilitate the aims of Clean Power 2030. The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement. The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the Applicant considers that the exclusion of these works and operations from the definition is appropriate. The Applicant does not consider it necessary or appropriate to include the Council's proposed tailpiece, since any failure to comply with a term of the DCO by the Applicant would be an offence. Furthermore, recently made DCOs do not include such a tailpiece.		

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5	DCO Wording - Certified documents	The definition of Environmental Statement in Article 2 of **3.1 Draft DCO[REP5-060]** includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the Requirements. By virtue of this inclusion in the definition, and the inclusion of the Environmerital Statement in Schedule 19 (certified documents), the Applicant's position remains that from a statutory drafting perspective, the proposed change is not necessary. The Applicant would note that the inclusion of a document in the list of certified documents does not give it any more weight than one that is not listed. The purpose of the list of certified documents is to record the correct version of the listed document at the time at which development consent is granted. The Applicant is unclear which list of certified documents the Council is seeking to be updated following the grant of development consent. It would be inappropriate and disproportionate to seek updates to Schedule 19 (certified documents) after the grant of development consent. The certified documents will be available on the Planning Inspectorate's website and, under Article 60(5) (certification of documents) the Applicant must make available in electronic form each	BDC notes the Applicant's explanation regarding the purpose of certified documents and accepts that Schedule 19 is intended to record the approved versions of documents at the point development consent is granted. The Council's concern has principally been to ensure that environmental information submitted post-consent remains publicly available and capable of being relied upon for compliance, monitoring and enforcement purposes. BDC notes that approved discharge documentation would be retained through the relevant authority's normal records and no longer pursues amendments to the certified documents provisions. Accordingly, this matter is agreed.	Agreed

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		of the plans or documents certified under that article. Each relevant authority would retain a record of any documents approved during the discharge of Requirements in the usual way.		
6	DCO Wording - Maintain	It is not appropriate or necessary for the definition of "maintain" in the draft Development Consent Order to be amended as proposed. The question of whether works listed in that definition give rise to any materially new or materially different environmental effects to those identified in the environmental statement is, in the usual manner of development consent orders made to date, an objective test and one which the Applicant considers should remain with the Applicant as is common on electricity project such as this. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. Non-compliance with that objective test could be a breach of a term of the development consent order for the purposes of section 161 of the Planning Act 2008 enforceable in the usual manner. The Applicant notes the Council's suggested deemed consent mechanism for approval in connection with the exercise of maintenance powers under the DCO, however it maintains its position above which it considers to be appropriate and	BDC does not agree that the current drafting of the maintenance provisions provides sufficient environmental control or clarity. The Council's position is that it must be clear who determines whether proposed maintenance works would give rise to any materially new or materially different environmental effects compared with those assessed in the Environmental Statement. As currently drafted, this judgement is left entirely to the undertaker, which does not provide an adequate safeguard and risks environmentally consequential works being treated as 'maintenance' without appropriate oversight. BDC considers that any maintenance activity with the potential to create materially new or different environmental effects should be subject to approval by the relevant planning authority, consistent with the wider approach to Requirements and with the expectations of a scheme of this scale. Without prejudice to its primary position, the Council recognises the Applicant's concern regarding potential delay arising from additional oversight. Should the Examining Authority be minded to support the inclusion of Local Planning Authority oversight in this	Not Agreed

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		proportionate in the circumstances of this Project. As transmission licence holder, the Applicant is the appropriate body with the expertise to discharge its statutory duties in respect of electricity equipment. It is essential that the Applicant is not delayed or prevented from carrying out essential maintenance that enables it to comply with this duty. Furthermore, it would not be appropriate to require the Applicant to approach the relevant planning authority prior to carrying out emergency repair works which also fall within the definition of 'maintain'. The inclusion of an obligation to maintain the Project is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. As noted above, the Applicant's current approach to maintenance has precedent in a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and the Applicant does not consider it necessary or appropriate to depart from such precedent in this case.	matter, the Council considers that this could be appropriately balanced through the inclusion of a deemed consent mechanism (for example, after 20 working days), to ensure that decisions are made in a timely manner and that no undue delay is introduced to the delivery of the project. In addition, the Council considers that the DCO should include a clear obligation on the undertaker to maintain the authorised development and to remove any equipment or works that become obsolete, to avoid unnecessary long-term landscape, heritage or amenity impacts. Until the maintenance provisions are amended to secure these safeguards, the matter remains Not Agreed.	

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ID	Matter	National Grid's Position	Braintree District Council's Position	Status
7	DCO Wording - Maintenance	These proposed amendments are not appropriate or necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system.	Article 3 - Development consent etc. granted by the Order BDC acknowledges the Applicant's statutory duties as a transmission licence holder to maintain its apparatus and ensure the safe and efficient operation of the electricity transmission network. However, the Council remains of the view that the draft DCO should impose a clear obligation on the undertaker to maintain the authorised development and to remove infrastructure which becomes obsolete, redundant or no longer required. In the absence of such a provision, there is a risk that unused structures or equipment could remain in situ and give rise to unnecessary long-term landscape, heritage or amenity impacts. BDC also considers that additional safeguards are required where maintenance activities have the potential to give rise to materially new or materially different environmental effects from those assessed in the Environmental Statement. Accordingly, whilst the Council acknowledges the Applicant's statutory maintenance responsibilities, it does not consider these to be an adequate substitute for the controls sought through the draft DCO and therefore maintains its objection. This matter remains Not Agreed.	Not Agreed

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8	DCO Wording - Definition of "relevant planning authority"	Where local government reorganisation results in more than one successor authority across a current given area — as may well occur across Essex — the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is already optimally structured from a statutory drafting perspective to address the scenario described. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case. The proposed addition of "or successors" (plural) is unnecessary: the reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument	BDC notes ECC's comments regarding the definition of "relevant planning authority" and the implications of local government reorganisation. The Council has no further comments beyond those raised by ECC and will defer to ECC's detailed position on this matter.	Under discussion

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		that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.		
9	DCO Wording - Limits of deviation	The vertical Limits of Deviation (LoD) would not exceed 6 m upwards to allow for variation in pylon positions whilst maintaining electrical clearance requirements. The 6 m vertical LoD allows for two standard pylon extensions to be added, which is not possible with a 4 m vertical LoD. This is due to lattice pylon extensions typically increasing by increments of 3 m. A 6 m vertical LoD was	BDC does not agree that the Applicant has demonstrated that a true worst-case assessment has been undertaken for the full extent of the Limits of Deviation proposed in Article 5 of the draft DCO. Throughout the Examination, the Council has consistently raised concerns that a number of environmental assessments, including landscape and visual, heritage, residential visual amenity and noise, have been	Not Agreed

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		sought and consented on the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicant's position is that the additional 2 m vertical LoD is proportionate to the scale of the Project and, therefore, the extent of any unknowns, the varying landforms and use across the circa 160 km overhead line route, and ongoing design coordination with a range of third-party developments that could lead to minor design changes at detailed design and construction stages. The limits of deviation have been assessed in the Environmental Statement submitted with the application for development consent.	undertaken using indicative pylon locations rather than fully assessing the maximum extent of lateral, longitudinal and vertical movement permitted by the draft DCO. BDC therefore remains unconvinced that the Environmental Statement adequately assesses the maximum adverse effects that could arise if the full Limits of Deviation were exercised. Notwithstanding this wider concern, the Council's primary concern now relates to a number of specific sensitive receptors where the exercise of the Limits of Deviation could materially worsen assessed effects. In particular, as set out in the Council's Deadline 6 submissions, BDC considers that commitment GG34 should be amended so that the alignment is fixed in the vicinity of Residential Visual Amenity Assessment receptors E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm). This would require towers TB93 and TB94 to be fixed in relation to receptor E7, and towers TB97 and TB98 to be fixed in relation to receptor E8. The Council considers that fixing these towers would provide certainty that the exercise of the authorised flexibility cannot result in greater residential visual amenity effects than those assessed during the Examination. In addition, BDC remains unconvinced that the justification for a 6 metre vertical Limit of Deviation has been demonstrated. The Council notes that a 4 metre vertical deviation was	

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			accepted in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and considers that the Applicant has not provided sufficient evidence to justify the greater degree of flexibility sought for this Project. BDC therefore considers that the vertical Limit of Deviation should be reduced from 6 metres to 4 metres. Until either the Limits of Deviation are reduced, or additional safeguards are incorporated into the DCO to provide certainty that no materially greater environmental effects can arise than those assessed, this matter remains Not Agreed.	
10	DCO Wording - Power to alter layout etc. of streets	In relation to comments on Article 4 (Maintenance of authorised development) these proposed amendments are not appropriate or necessary. Notification of any works to alter the layout, etc. of streets would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project.	BDC considers that the relevant planning authority should receive advance notification where powers under Article 14 are exercised within its administrative area. The Council considers that such notification is necessary to ensure awareness of works which may interact with local planning, highway, environmental or infrastructure matters, and to assist in coordinating activities with other development proposals and statutory functions. Whilst the Council acknowledges the Applicant's concerns regarding administrative burden, it does not consider a notification requirement to be disproportionate given the scale and duration of the Project.	Not Agreed

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			In the absence of a suitable notification mechanism, the Council remains concerned that works affecting streets could be undertaken without the relevant planning authority being informed. This matter remains Not Agreed.	
11	DCO Wording - Access to works	Notification of any works to accesses would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project. National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate,	[Article 17 - Access to Works] BDC considers that the relevant planning authority should receive advance notification where powers under Article 17 are exercised within its administrative area. This would assist the Council in identifying any potential interactions with local planning, highway or environmental matters and provide appropriate oversight of project activities. The Council notes the Applicant's amendments to the draft DCO to increase decision periods from 28 days to 25 business days. Whilst BDC would prefer a longer period, consistent with previous DCO precedent, it acknowledges that the revised drafting represents an improvement. The Council therefore remains of the view that a formal notification mechanism should be included within the DCO. Subject to suitable notification provisions being secured, BDC considers this matter capable of resolution.	Not Agreed

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		proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.		
12	DCO Wording - Discharge of water	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25	[Article 20 - Discharge of Water] BDC acknowledges that, to the extent this Requirement applies within its administrative area, the discharge of water provisions follow established DCO practice. While the Council noted that a 35-day deemed consent period (as used in the Bramford to Twinstead DCO) would be preferable, BDC accepts that the detailed operation of these	Agreed

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		business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.	provisions is ultimately a matter for the Examining Authority's judgment. On that basis, the Council does not pursue amendments to this Requirement further and is content for the ExA to determine the appropriate approach.	

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13	DCO Wording - Protective Works	The **3.1 Draft DCO [REP5-060],** once granted, will provide the relevant planning consent for these protective works. The Applicant would notify owners and occupiers of the land prior to exercising certain rights under Article 21 (Protective Provisions), except in the case of emergency. Article 61 (service of notices) of the **3.1 Draft DCO [REP5-060]** deals with the service of notices.	[Article 21 - Protective Works] BDC considers that a formal notification mechanism should be included where protective works are proposed outside the Order Limits. The Council considers that notification is necessary to ensure transparency regarding works undertaken within its administrative area and to allow the relevant planning authority to identify whether any additional planning, environmental or regulatory requirements may be engaged. Advance notification would also assist in coordinating such works with other development proposals, highway activities and statutory functions undertaken by the Council and other authorities. Whilst the Council acknowledges the Applicant's position that notification is unnecessary, BDC considers that a proportionate notification requirement would represent an appropriate safeguard for a project of this scale and duration. In the absence of a suitable notification provision within the draft DCO, this matter remains Not Agreed.	Not Agreed
14	DCO Wording - Felling and Lopping	The proposed amendments (in relation to local authority notice and consent or amendments to the terms "overhanging" and "near") to this standard form provision are not appropriate or necessary. Article 50	[Article 50 - Felling and Lopping] BDC does not agree that the current drafting provides adequate control over tree works undertaken outside the Order limits. The term 'near' is vague and does not give sufficient	Not agreed

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		(Felling or lopping) within **3.1 Draft DCO [REP5-060],** together with **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055],** set out controls on the Applicant's powers to fell and lop trees. Whilst there is no definition of 'near' in the **3.1 Draft DCO [REP5-060]** (which is consistent with the model provisions on which this article is based) the power in Article 50 (1) is limited and the given circumstances will help to define its meaning. More specifically, the Applicant notes that the power at Article 50 (1) may only be exercised for the specific statutory purpose(s) set out, namely to prevent an obstruction or interference with the construction, maintenance or operation of the 'authorised development' (as defined) or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same. Therefore, as the distance from the Order limits increases, the more unlikely it will be for these statutory tests to be met. Article 50(2) of **3.1 Draft DCO [REP5-060]** places a statutory duty on the Applicant not to cause any unnecessary damage to any tree, shrub, shrubbery or hedgerow, or important hedgerow, when exercising its powers under this article.	certainty as to the extent of permissible works or the environmental implications. Experience from the Bramford to Twinstead DCO indicates that similar wording enabled more extensive lopping and removal than anticipated, with consequential landscape and amenity impacts. See BDC's response to DCO 1.S11 for more information on examples. Given that once tree or hedgerow works occur the harm cannot be undone, BDC considers it essential that a third-party control mechanism is incorporated. The Council therefore requests that the DCO be amended to: replace the undefined term 'near' with a clear and measurable threshold; and require advance notification to the relevant planning authority for any tree works outside the Order limits, ensuring such works are strictly limited to what is reasonably required and that unassessed environmental harm is avoided. Until these safeguards are secured, this matter remains Not Agreed	

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		Other recent development consent orders have made similar provision. See, for example, Article 48 (1) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024, Article 81 (1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 32 (1) of the Cleve Hill Solar Park Order 2022 and Article 35 (1) of the Norfolk Boreas Offshore Wind Farm Order 2021. None of the Orders referred to included a definition of 'near'. The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within **3.1 Draft DCO [REP5-060]** and to ensure that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.		
15	DCO Wording - Trees subject to Tree Preservation Orders	The proposed amendments (in relation to local authority notice and application of conditions or amendments to the term "near") to this standard form provision are not appropriate or necessary. Article 51 (Trees subject to Tree Preservation Orders) within **3.1 Draft DCO [REP5-060],** together with **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055],** set out controls on the Applicant's powers to fell and lop trees protected by TPOs, both within and outside	[Article 51 - Trees Subject to Tree Preservation Orders] BDC does not agree that the current drafting provides sufficient clarity or control over works affecting protected trees, particularly where such works occur outside the Order Limits. The Council remains concerned that the term "near" is undefined and does not provide sufficient certainty regarding the extent of permissible works or their potential environmental effects. Given the sensitivity of protected trees and the irreversible nature of	Not Agreed

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		the Order limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. The use of 'near' is to mirror the wording used in Article 50 (Felling and lopping of trees, etc). A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. Additionally, Article 51(3) of **3.1 Draft DCO [REP5-060]** places a statutory duty on the Applicant not to cause any unnecessary damage to any tree when exercising its powers under this article, a breach of which would be an offence. The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within **3.1 Draft DCO [REP5-060]** and to ensure that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily	tree loss or damage, BDC considers that greater certainty is required within the drafting. BDC also considers that a formal mechanism for advance notification to the relevant planning authority should be included where powers under Article 51 are exercised. This would provide an appropriate level of oversight and help ensure that any proposed works are limited to those genuinely necessary for the construction, operation or maintenance of the authorised development. In addition, BDC considers that equivalent protections should be afforded to trees located within Conservation Areas, noting that such trees benefit from statutory protection and may be subject to future Tree Preservation Orders where risks are identified. Until these safeguards are secured within the draft DCO, this matter remains Not Agreed.	

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		delayed by matters outside the control of the Applicant. Please see comments on Article 50 above.		
16	DCO Wording - Definitions and terminology	The Applicant has considered the point and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has amended the drafting in **3.1 Draft DCO [REP5-060]** submitted at Deadline 3 to refer to business days rather than days.	BDC welcomes the amendments made by the Applicant to improve consistency in the drafting of timescales throughout the draft DCO, including the replacement of references to "days" with "business days" in the majority of provisions. The Council's concern throughout the Examination has been to ensure that statutory and administrative timescales are expressed in a clear and consistent manner, reflecting actual working days available for consultation, assessment and decision-making by local authorities and other stakeholders. Subject to the remaining drafting being updated where necessary to ensure consistency across the DCO, BDC considers that the Applicant has substantially addressed the Council's concerns regarding definitions and terminology.	Agreed
17	DCO Wording - Service of Notices	This article replicates the wording of article 45 of the National Grid (Hinkley Point C Connection Project) Order 2016 and article 57 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. The Applicant notes that the Council is not seeking to alter this standard form procedural wording but wishes to agree within its context how	[Article 61 - Service of Notices] BDC notes the Applicant's position that Article 61 reflects standard DCO drafting and accepts that the detailed arrangements for the service of notices and day-to-day communications between the undertaker and the relevant planning authority can be agreed outside the DCO framework.	Agreed

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		notices are to be given day to day. This is noted and would be a matter for discussion between the Applicant and the Council following the making of the Development Consent Order.	The Council considers it important that clear communication channels are established at an early stage to support the efficient administration of the DCO and discharge of Requirements. On that basis, BDC does not seek any further amendment to Article 61 and considers this matter resolved.	
18	DCO Wording - Associated Development	These proposed amendments are not appropriate or necessary. The Applicant does not agree that the words 'in the opinion of the relevant planning authority' should be added to paragraph (u) of the Associated Development section of Schedule 1 of **3.1 Draft DCO [REP5-060].** Producing reports for consideration by the relevant authority in each instance any works fall within the final paragraph of 'associated development' and seeking the relevant planning authority's opinion on whether an element of associated development may result in a materially new or materially different environmental effect would be a disproportionate administrative and financial burden on both the Applicant and the relevant authority and could frustrate the delivery of this Project of critical national priority. In turn, this could contribute to the accumulation of additional constraints costs that would ultimately fall to the consumer.	BDC does not agree that the current drafting provides sufficient control over works undertaken under the umbrella of 'associated development'. As drafted, the undertaker alone determines whether such works would give rise to materially new or materially different environmental effects. For a project of this scale, this approach does not offer an adequate safeguard; there is no independent check or incentive for the undertaker to identify when additional assessment or consent may be required. To ensure proper oversight, BDC requests that the provision be amended so that any judgement on environmental effects arising from associated development is made in the opinion of the relevant planning authority. In addition, because the category of associated development is currently broad and unspecified, the Council requires advance notification of any such works. This is essential to maintain a full understanding of the project	Not agreed

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		The Applicant's position is that the assessment as to whether an element of currently unspecified associated development (some of which may be very inconsequential in nature) results in a new or materially different environmental effect should remain with the Applicant, noting that a failure of the Applicant to comply with a term of the DCO would be an offence. Equally, the Applicant is conscious of the potential for significant additional administrative burden, both on the Applicant and the relevant authority, should notification be required for any works that fall within the remit of associated development.	as built, to identify any interactions with other regulatory processes, and to ensure that unassessed or avoidable impacts do not arise. Until these safeguards are incorporated into the draft DCO, this matter remains Not Agreed.	

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4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

DocuSigned by:

[redacted]

Date:

21/07/2026

Signed for and on behalf of Braintree District Council:

Signed by:

[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
BNG	Biodiversity Net Gain
BDC	Braintree District Council
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
MSBDC	Mid Suffolk and Babergh District Council
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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